



Hycroft Mining Holding Corp. 2025 HYMC ESG SCORECARD

Hycroft Mining 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. After a long history of oxide heap leaching operations, the Company is focused on completing the technical studies to transition the Hycroft Mine into the next phase of commercial operations 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 - a game changer for the Hycroft Mine.

Company Profile

Organizational Profile

Name	Hycroft Mining Holding Corp.
Describe nature of activities, brands, products and services	Mining/Exploration
Link to Corporate Website	https://hycroftmining.com/
Industry Classifications	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
Type of Operations	Gold and Silver Mining Company
Company Headquarters	Virtual, United States of America

ESG Accountability

Role of highest authority within the company for Environment, Social and Governance strategy, programs and performance (ONYEN)	Board of Directors (BoD)
<i>Affiliations: IPIECA C2 CCE-1 WEF-MS C Pillar 1: Principles of Governance - Quality of Governing Body - Governance body composition</i>	Board of Directors
The name of the highest authority, if applicable	ESG Committee

IFRS Sustainability Disclosure Standards General Requirements

Choose the statement of compliance (IFRS-S1 S1.72)	Not applicable
Entity made explicit and unreserved statement of compliance	False
This report covers the following period (IFRS-S1 S1.66-a)	
From (IFRS-S1 S1.66-a)	2025-01-01
To (IFRS-S1 S1.66-a)	2025-12-31
Reason for using reporting period longer or shorter than 12 months (IFRS-S1 S1.66-b)	Not Applicable
Amounts disclosed in sustainability-related financial disclosures are not entirely comparable due to change in length of reporting period (IFRS-S1 S1.66-c)	False
Disclose information about transactions, other events and conditions that occur after the end of the reporting period, but before the date on which the sustainability-related financial disclosures are authorised for issue (IFRS-S1 S1.68-1)	Hycroft Mining Holding Corporation has reported in compliance with all SEC Disclosure Standards for the reporting period from January 1, 2025 to December 31, 2025. As of the date these sustainability-related financial disclosures were authorized for issue, there were no material transactions, other events or conditions occurring after the end of the 2025 reporting period that would require disclosure

GRI Reporting Requirements

Choose the statement as to how the organization has aligned their reporting utilizing GRI Standards (GRI 1-3)

Affiliations: GRI "The GRI Standards are used by Onyen Corporation under licensed authority from GRI. GRI, as Licensor of the copyright in the GRI Standards, verified and validated the authentic and accurate representation of the GRI Standards in the Onyen software platform. This verification was limited to ensuring the maintenance of the integrity, authenticity and accuracy of the Licensed Content. GRI therefore makes no implied or actual representations or warranties as to the correctness, compliance, trustworthiness, fitness of purpose or quality of Onyen software or any products resulting therefrom; or of Licensee's use of the GRI copyrighted content; and expressly disclaims any implied or express representations that any report produced by Licensee meets the standards of an approved GRI Standards Report."

or significantly impact the information presented in this report.

The organization has reported in accordance with the GRI Standards for the period defined below

ESG Reporting Period

Unless otherwise noted, all data contained in this report covers the following period (GRI 2-3-a)

Affiliations: CDSB Chapter 2 - How Should Climate-related Matters be Factored into a Company's Financial Reporting? - 1. IAS 1 - Presentation of Financial Statements | ESRS ESRS 1-73 | IFRS-S1 S1.22

From 2025-01-01

To 2025-12-31

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 (GRI 2-5-a)

We do not currently utilize external assurance services.

Affiliations: CDSB Appendix C | GRI 102-56 | PRI OO 5

Are the highest governance body and senior executives involved Yes

Describe how the highest governance body and senior executives are involved Hycroft is compliant with state and federal governing bodies. Senior Management has signed off on the commitment to operational excellence.

Has the report been externally assured (GRI 2-5-b)

No

Affiliations: GRI 102-56 | PRI OO 6 | TCFD Assurance

Financial Reporting Period

Does the financial reporting period align with the sustainability reporting period (e.g. calendar vs fiscal) (GRI 2-3-b)

Yes

Affiliations: CDP 1.4 | CSDS 1-64 | ESRS ESRS 1-73, ESRS 2 BP-1-5 (b)-i | IFRS-S1 S1.22

Geographic Scope of Report

Unless otherwise noted, the data in this report covers sustainability matters related to the following locations of operations (GRI 2-1-d)

United States of America

Affiliations: CDP 1.7



State of Nevada - Project Location

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.) (ONYEN)

None

Affiliations: CDP 1.5 | CDSB Chapter 1 - Section 4: Summary - Climate Change and Financial Reporting Chapter 2 - Section 1: IAS 1 - Presentation of Financial Statements | ESRS ESRS 2 BP-1-5 (a) and (b) i | IPIECA C3 GOV-2

Reporting Practice

Provide a list of all legal entities included in its sustainability reporting (GRI 2-2-a)

Hycroft Mining Holding Corporation

Affiliations: CDP 1.5 | CDSB REQ-07 | ESRS ESRS 1-5.1, ESRS 2 BP-1-5 (a) and (b) i | IFRS-S1 S1.20

Does the organization have audited consolidated financial statements or financial information filed on public record (GRI 2-2-b)

Yes

If the organization has audited consolidated financial statements or financial information filed on public record, specify the differences between the list of entities included in its financial reporting

None

and the list included in its sustainability reporting (GRI 2-2-b)

Affiliations: CDSB REQ-08 | ESRS ESRS 1-5.1, ESRS 2 BP-1-5 (b) i | IFRS-S1 S1.20

Does the organization consist of multiple entities (GRI 2-2-c)	No
Specific standards, pronouncements, industry practice and other sources of guidance that the entity has applied in preparing its sustainability-related financial disclosures, including, if applicable, identifying the disclosure topics in the SASB Standards (IFRS-S1 S1.59-a)	Not Applicable
Industries applied in preparing sustainability-related financial disclosures (IFRS-S1 S1.59-b)	Not Applicable

Connected information

Identify the financial statements to which the sustainability related financial disclosures relate (IFRS-S1 S1.22)

Affiliations: CSDS 1.21 | ESRS ESRS 2 SBM-3-48-d

Identify the financial statements to which the sustainability related financial disclosures relate (IFRS-S1 S1.22)	Not Applicable
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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 (IFRS-S1 S1.23)

Yes

Is the entity taking transition relief, which permits disclosure of only climate-related risks and opportunities (IFRS-S1 S1.E5)

The entity is not taking transition relief

Judgements, Uncertainties and Errors

Disclose information to enable users of this general purpose financial report to understand the judgements, apart from those involving estimations of amounts, that the entity has made in the process of preparing its sustainability-related financial disclosures and that have the most significant effect on the information included in those disclosures (IFRS-S1 S1.74)

Not Applicable

Are there any material prior period errors that require restating the comparative amounts for the prior period(s), provide details (IFRS-S1 S1.86)

No

Affiliations: CSDS 1.86

Application Guidance

Is there omitted material information due to legal or regulatory prohibition, and if so identify the type of information not disclosed and explain the source of the restriction (IFRS-S1 S1.B33)

Based on Hycroft Mining's policies and governance framework, material information may be omitted from public disclosures when subject to legal or regulatory restrictions, including information that is material and nonpublic under securities laws. Specifically, the Company restricts disclosure of material nonpublic information pending public announcement, including information related to pending mergers, acquisitions, divestitures, negotiations with outside parties, and other significant corporate developments. Additionally, information subject to attorney-client privilege, work product doctrine, and ongoing litigation matters may be withheld. Confidential information entrusted to the Company on a confidential basis is restricted from disclosure until public announcement and sufficient market absorption time has elapsed. These restrictions derive from the Securities Exchange Act of 1934, Regulation Fair Disclosure, insider trading laws, and applicable common law privileges. The Company's Insider Trading Policy and Regulation Fair Disclosure Policy establish the framework for determining when material information must be restricted from disclosure to comply with federal securities laws and fiduciary duties to investors.

The entity qualifies for the exemption of disclosure omissions of commercially sensitive information based on (IFRS-S1 S1.B35)

The entity has determined that it is impossible to disclose that information in a manner that would enable the entity to meet the objectives of the disclosure requirements without prejudicing seriously the economic benefits the entity would otherwise be able to realise in pursuing the opportunity

The entity has used the exemption for omitting commercially sensitive information about opportunities (IFRS-S1 S1.B36)

True

Disclose information about significant differences between the data and assumptions used in preparing the entity's sustainability-related financial disclosures and the data and assumptions used in preparing the related financial statements (IFRS-S1 S1.B42-c)

Not Applicable

Reporting Practice

Report what are the restatements and the reasons for restatements, if any, from previous reporting periods (GRI 2-4-a-i) <i>Affiliations: ESRS ESRS 2-BP-2-13 (a) to (c), ESRS 2-BP-2-14 (a) to (b) GRI 102-48</i>	Not Applicable
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 (GRI 2-3-d) <i>Affiliations: GRI 102-53 PRI OO 11</i>	David Thomas Senior Vice President and General Manager david.thomas@hycroftmining.com T: +1 (775) 623-5260
Currency Unless otherwise noted, all financial figures referenced in this report are in the following currency (ONYEN) <i>Affiliations: CDP 1.2 IFRS-S1 S1.24</i>	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. (GRI 2-28-a) <i>Affiliations: CDSB REQ-02 ESRS ESRS 1-11 and MDR-M GRI 102-13</i>	Society of Mining Engineers, Nevada Mining Association, National Mining Association
Scale of the Organization Nature of corporate ownership (GRI 2-1-b) <i>Affiliations: CDP 1.3</i>	Publicly owned
Legal form of corporate ownership (GRI 2-1-b) <i>Affiliations: CDP 1.3</i>	Incorporated entity
Describe how the organization defines its "Operation" and the sector(s) in which it is active (GRI 2-6-b-i) <i>Affiliations: CDP 1.17, 1.3 ESRS ESRS 2-SBM-1-40 (a) i to (a) ii, (b) to (c), SBM-1-42 (c) GRI 102-7</i>	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 56 employees.
Report the total number of operations (GRI 2-6-b-i) <i>Affiliations: CDP 1.3 ESRS ESRS 2-SBM-1-40 (a) i to (a) ii, (b) to (c), SBM-1-42 (c) GRI 102-7 IFRS-S2 EM-MM-000.B, S2.32 SASB EM-MM-000.B WDI Section 3: Workforce Composition - Direct Operations Section 6: Stability - Direct Operations</i>	1
The organization's definition used for 'mine site' (GRI 14.0.1)	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. In 2025, the Company further strengthened its property position by acquiring the Crofoot sulfur and other mineral rights, enhancing the Company's control over its resource base and eliminating the Crofoot net profits royalty obligation. 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 regraded 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.
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" (ONYEN)	None
Mineral Resource Types in Scope	

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

Affiliations: SASB EM-MM-160a.3 | WEF-MSC Pillar 2: Planet - Resource Availability - Resource Circularity

- 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)

Mineral Reserve Types in Scope

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

None

Affiliations: SASB EM-MM-160a.3 | WEF-MSC Pillar 2: Planet - Resource Availability - Resource Circularity

Strategy

Corporate Purpose, Vision, Mission and Values; statements of sustainability/ESG strategy (GRI 2-22-a)

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

Affiliations: ESRS ESRS 2 SBM-1-40 (g) | GRI 102-16 | IPIECA C2 GOV-1 | WEF-MSC Pillar 1: Principles of Governance - Governing Purpose - Setting Purpose

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) (GRI 2-22-a)

Please refer to the CEO Statement attached.

Affiliations: ESRS ESRS 2 BP-2-17 (a), ESRS 2 SBM-1-40 (g) | GRI 102-14 | IPIECA C2 GOV-1 | WEF-MSC Pillar 1: Principles of Governance - Governing Purpose - Setting Purpose; Stakeholder engagement - Material issues impacting stakeholders



CEO Statement



President and CEO, Diane Garrett

Material Topics

Governance of Material Topics

Describe the process followed to determine the organization's material topics (GRI 3-1-a)

Management conducts a quarterly risk analysis internally, with input from the Board of Directors.

Affiliations: CSDS C1-3 | ESRS ESRS 2 BP-1-5 (c), ESRS 2 BP-1-AR 1 (a), IRO-1-53 (b) ii to (b) iv | GRI 102-15, 102-44, 13.1-26

How did the organization identify the material topics

- Financial statement analysis
- Materiality Assessment
- Environmental impact assessment

How did the organization prioritize the impacts based on their significance

Risk prioritization is 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 (GRI 3-1-b)

- Employees and other workers
- Governments
- Local communities
- Shareholders and other capital providers
- Suppliers

Affiliations: ESRS ESRS 2 BP-1-AR 1 (a), IRO-1-53 (b) iii | GRI 102-15, 13.1.1-26 | WEF-MSC Pillar 1: Principles of Governance - Stakeholder engagement - Material issues impacting stakeholders

List the organization's material topics (GRI 3-2-a)

- Greenhouse Gas Emissions
- Air Emissions & Pollution
- Water and Effluents
- Closure or Decommissioning
- Workforce Health and Safety
- Human Rights
- Local Communities

Affiliations: ESRS ESRS 2 BP-2 §17, ESRS 2 SBM-3 §48 (a) and (g) | GRI 102-15, 102-47, 13.1.1-16 | WEF-MSC Pillar 1: Principles of Governance - Stakeholder engagement - Material issues impacting stakeholders, Risk and Opportunity Oversight - Integrating risk and opportunity into business process

List the organization's non-material topics (GRI 3-2-a)

- Biodiversity
- Diversity, Equal Opportunity & Inclusion
- Equal Remuneration for Women and Men
- Community Health, Safety, and Security
- Security
- Local Communities
- Child Labour
- Forced or Compulsory Labour
- Living Income and Living Wage

Affiliations: ESRS ESRS 2 BP-2-17, ESRS 2 SBM-3-48 (a) and (g) | GRI 102-15, 13.1.1-26 | IFRS-S1 S1.B25 | WEF-MSC Pillar 1: Principles of Governance - Stakeholder engagement - Material issues impacting stakeholders, Risk and Opportunity Oversight - Integrating risk and opportunity into business process

<p>Provide reasons for considering such topics not material, provide details (GRI 3-2-a)</p> <p><i>Affiliations: ESRS ESRS 2 SBM-3-48 (a) and (g) GRI 102-15, 13.1.1-26 WEF-MSC Pillar 1: Principles of Governance - Stakeholder engagement - Material issues impacting stakeholders, Risk and Opportunity Oversight - Integrating risk and opportunity into business process</i></p>	<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 the company, as well as the location of our asset, we believe that these factors do not have a material impact on our current activities.</p>
<p>Report changes to the list of material topics compared to the previous reporting period (GRI 3-2-b)</p> <p><i>Affiliations: ESRS ESRS 2 SBM-3-48 (a) and (g) GRI 102-15, 13.1.1-26 WEF-MSC Pillar 1: Principles of Governance - Stakeholder engagement - Material issues impacting stakeholders, Risk and Opportunity Oversight - Integrating risk and opportunity into business process</i></p>	<p>None</p>
<p>Material Topic 1</p>	
<p>Material topic identified (GRI 3-3-a)</p> <p><i>Affiliations: ESRS ESRS 2 SBM-1-40 (e); SBM-3-48 (c) i and (c) iv; MDR-P, MDR A, MDR-M, and MDR-T, ESRS S1 S1-2-27; S1-4-39 and AR 40 (a); S1-5-47 (b) to (c), ESRS S2 S2-2-22; S2-4-33, AR-33 and AR-36 (a); S2-5-42 (b) to (c), ESRS S3 S3-2-21; S3-4-33, AR 31, AR 34 (a); S3-5-42 (b) to (c), ESRS S4 S4-2-20, S4-4-31, AR 30, and AR 33 (a); S4-5-41 (b) to (c) GRI 13.1.1-26, 14.1-25.1</i></p>	<p>Air Emissions and Pollution</p>
<p>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>	<p>Workforce health and safety is material to Hycroft because our employees and contractors are our most valuable asset and their protection is central to our business operations and financial performance. The topic directly impacts the health of our personnel. Potential negative impacts include occupational exposure of dust particles that could harm our workforce. A core value is to maintain a strong safety culture that enhances operational efficiency, regulatory compliance, and community trust. As an exploration and development company, we have direct responsibility for managing workplace hazards through our daily activities and business relationships with contractors and vendors. Hycroft recognizes that we have a social responsibility to protect the wellbeing of all individuals connected to our operations. As Hycroft continues the exploration program, it is clear that dust generation and dust control are going to be a challenge with increased traffic on the roads and limited water supply for dust control.</p>
<p>Where the impacts occur</p>	<p>Impacts may occur throughout our daily activities.</p>
<p>The organization's involvement with the impacts. e.g., whether the organization has caused or contributed to the impacts, or is directly linked to the impacts through its business relationships</p>	<p>Hycroft Mining provides extensive and ongoing safety training for our employees, contractors, vendors, and any other visitor coming to site. The goal is to recognize harmful conditions and be proactive in responding to the condition and implement corrective actions commensurate with the hazard.</p>
<p>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</p>	<p>Not applicable</p>
<p>Describe/provide a link to the corporate policies or commitments regarding the topic</p>	<p>Please refer to our Sustainability Policy at the link provided below. Sustainability Policy</p>
<p>Explain how the organization manages the topic and actions to prevent or mitigate potential negative impacts</p>	<p>Extensive and ongoing safety training for our employees, contractors, vendors, and any other visitors coming to site.</p>
<p>Describe actions to address actual negative impacts, including actions to provide for or cooperate in their remediation</p>	<p>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".</p>
<p>Describe actions to manage actual and potential positive impacts</p>	<p>Engaged in continuous improvement of our safety culture, our workplace conditions, and the health and welfare of our employees.</p>

Report the processes used to track the effectiveness of the actions;	<ul style="list-style-type: none"> • Measurement systems • Benchmarking
Report the goals, targets, and indicators used to evaluate progress	Corporate goal is 0 TRIFR and 0 LTI and exceeding industry average standard rating. Zero reportable conditions from the on-site monitoring stations.
Report the effectiveness of the actions, including progress toward the goals and targets; any related adjustments	The Company has achieved over 1.7 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. Increased monitoring and increased number of on-site audits to monitor traffic conditions and decrease speed around the mine.
Describe how engagement with stakeholders has informed the actions taken and how it has informed whether the actions have been effective	All stakeholders have input to the continuous improvement program by identifying hazards and unsafe conditions. In addition, the above is supported by our daily and monthly site-wide safety meetings.
Describe commitments to provide for or cooperate in the remediation of negative impacts that the organization identifies it has caused or contributed to (GRI 2-25-a)	Hycroft has not caused or created negative impacts relative to its material topics.
Percentage of grievances that were addressed (or reviewed) during the reporting period	Does Not Apply
Percentage of grievances that were resolved during the reporting period	Does Not Apply
Risk 1	
Sustainability-related risk (IFRS-S2 S1.30-a)	Hycroft has identified sustainability-related risks within its operations, though none are currently assessed as having substantive financial or strategic impact on the business. Climate-related risks are considered transitional in nature and are monitored through the company's integrated risk management process.
Specify the time horizons over which the effects of this sustainability-related risk could reasonably be expected to occur (IFRS-S1 S1.30-b)	Long term
<i>Affiliations: CSDS 1.30-b</i>	
Opportunity 2	
Sustainability-related opportunity (IFRS-S2 S1.30-a)	Hycroft has identified a climate-related opportunity to convert sulfur dioxide emissions into sulfuric acid production, which would reduce future harmful air emissions while generating a saleable product. The Company's focus on extraction of gold and silver metals aligns with growing demand for green technologies, particularly silver used in solar power generation and a wide range of electronics.
Specify the time horizons over which the effects of this sustainability-related opportunity could reasonably be expected to occur (IFRS-S1 S1.30-b)	Long term
<i>Affiliations: CSDS 1.30-b</i>	
Explain how does the entity define 'medium term' (IFRS-S1 S1.30-c)	Hycroft defines medium term as a period ranging from six months to one year, which is linked to the entity's planning horizons used for strategic decision-making. This timeframe sits between short-term planning cycles of three to six months and long-term planning horizons extending from one to five years, with the mine currently operating under a 34-year mine life projection before transitioning into care and reclamation.
<i>Affiliations: CDP 2.1 CSDS 1.30-c ESRS ESRS 2-BP-9 (a) IFRS-S2 S2.10-d TCFD Strategy</i>	
Explain how does the entity define 'long term' (IFRS-S1 S1.30-c)	Hycroft defines long-term as one to five years, which aligns with its mine life planning horizon of thirty-four years from the current assessment period, after which the mine will transition into care and reclamation.
<i>Affiliations: CDP 2.1 CSDS 1.30-c ESRS ESRS 2-BP-9 (a) IFRS-S2 S2.10-d TCFD Strategy</i>	
Other disclosures that enable understanding about risks and opportunities (IFRS-S1 S1.30)	Hycroft Mining identifies and manages risks and opportunities through an integrated governance structure that incorporates sustainability considerations into strategic planning and operational decision-making. The

company's Board, supported by the Environmental Social & Governance Committee and relevant management functions, systematically oversees enterprise risks including climate-related, environmental, social, and operational factors. Management regularly updates the Board on major initiatives and associated risks, with at least annual comprehensive reviews of enterprise-wide risk exposure and mitigation efforts. This approach ensures that sustainability-related risks and opportunities are evaluated alongside financial and operational considerations, enabling the company to align capital allocation, stakeholder engagement, and compliance activities with long-term value creation objectives.

Financial position, financial performance and cash flows

If the entity has determined that it needs not provide quantitative information about sustainability-related risks and opportunities, explain why (IFRS-S1 S1.40-a)

The financial effects of a sustainability-related risk or opportunity are not separately identifiable

Affiliations: CSDS 1.40-a

Provide qualitative information about those financial effects, including identifying line items, totals and subtotals within the related financial statements that are likely to be affected, or have been affected, by that sustainability-related risk or opportunity (IFRS-S1 S1.40-b)

Climate-related financial impacts and qualitative information are still in the process of being developed but there is no effect to the financial position, financial performance, or cash flows of the business.

Provide quantitative information about the combined financial effects of that sustainability-related risk or opportunity with other sustainability-related risks or opportunities and other factors unless the entity determines that quantitative information about the combined financial effects would not be useful. (IFRS-S1 S1.40-c)

Quantitative information about combined financial effects is not currently available. Climate-related risks and opportunities are included in the company's risk registry alongside other business and operational risks, and financial impact assessments are in process.

Resilience

Disclose a qualitative and, if applicable, quantitative assessment of the resilience of its strategy and business model in relation to its sustainability-related risks (IFRS-S1 S1.41)

Risk assessments are conducted quarterly by Hycroft senior management. The purpose of these assessments is to identify potentially new or emerging risks, openly review business activities, assess available resources, and then create action plans with accountability milestones to address the concern.

Affiliations: CSDS 1.41 | ESRs ESRS 2 SBM-3-48 (f)

How the assessment was carried out

Open discussion format using the assessment matrix with all members of the senior management staff.

Time horizon

Short-term (3 to 6 months), medium-term (six months to one year) and long term (1 to 5 years).

Metrics and Targets

Metrics

Is the entity using metrics taken from a source other than IFRS Sustainability Disclosure Standards (IFRS-S1 S1.49)

No

Are there used metrics that have been developed by the entity (IFRS-S1 S1.50)

No

Are there metrics for which the entity identified new information for the prior period (IFRS-S1 S1.B50)

No

Are there any replaced or redefined metrics in the reporting period (IFRS-S1 S1.B52)

No

Metric 1

Redefined or replaced metric in the reporting period (IFRS-S1 S1.B52)

Hycroft did not replace or redefine any metrics in the 2025 reporting period. All metrics remain consistent with prior period reporting, and no revisions to comparative amounts for preceding periods were considered practicable given the current reporting framework and data availability.

Disclose a revised comparative amount (IFRS-S1 S1.B52-a)

Hycroft Mining Holding Corporation has determined that revision of comparative amounts for the preceding period is impracticable. The entity did not identify new information for prior periods, did not replace or redefine metrics in the reporting period. Accordingly, comparative amounts presented for the 2024 reporting period remain as previously disclosed without adjustment.

Explain the changes (IFRS-S1 S1.B52-b)	Hycroft Mining maintains consistent metrics across reporting periods without replacement or redefinition.
Explain the reasons for those changes, including why the redefined or replacement metric provides more useful information (IFRS-S1 S1.B52-c)	Hycroft Mining maintains consistent metrics across reporting periods without replacement or redefinition.
Other disclosures about performance in relation to risks and opportunities (IFRS-S1 S1.45)	No disclosures have been made regarding performance risks or opportunities.
If it is impracticable to revise a comparative amount for the preceding period, the entity shall disclose that fact (IFRS-S1 S1.B54)	No revisions have been published on current or preceding metrics.
Revision of comparative amount of metric for preceding period is impracticable	True
For each sustainability-related risk and opportunity (other than climate-related) that could reasonably be expected to affect the entity's prospects, disclose metrics required by IFRS Sustainability Disclosure Standard and metrics the entity uses to measure and monitor risks and opportunities (IFRS-S1 S1.46)	
Metric 1	
Identified sustainability-related risk or opportunity (IFRS-S1 S1.46)	Hycroft Mining has maintained consistent metrics across all reporting periods without replacement, redefinition, or development of entity-specific metrics. No new information was identified for prior periods, and revision of comparative amounts for the preceding period was determined to be impracticable.
Metric used to measure and monitor risks/opportunities (IFRS-S1 S1.46)	The Company did not adopt metrics from external sources, develop entity-specific metrics, or revise metrics in the 2025 reporting period.
Metric Value, text	See details Risks are defined as a) greater than US\$1M to implement, b) require significant effort (management involvement, oversight, or direction), c) have an immediate negative impact on employee or contractor health, safety or the environment, or d) may have a negative impact to the business. Opportunities are defined as a) greater than US\$ 1M to implement, b) relatively easy to implement, c) may create a direct improvement to the employee or d) may create an immediate improvement to the workplace.
Metric Value, numeric	See details in prior response
Metric Value, percentage	See details in prior response
Targets	
Disclose information about the targets it has set to monitor progress towards achieving its strategic goals, and any targets it is required to meet by law or regulation (IFRS-S1 S1.51)	Hycroft has not established formal targets to monitor progress towards achieving strategic sustainability goals. As an exploration and development stage company, Hycroft employs a measure and monitor approach to track key performance metrics including safety, environmental compliance, and operational efficiency.
Target 1	
The metric used to set the target and to monitor progress towards reaching the target (IFRS-S1 S1.51-a)	Hycroft has not established formal targets to monitor progress towards achieving strategic sustainability goals. As an exploration and development stage company, Hycroft is currently employing a measure and monitor approach to track key performance metrics including safety, environmental compliance, and operational efficiency.
The specific quantitative or qualitative target the entity has set or is required to meet (IFRS-S1 S1.51-b)	Hycroft has not established formal quantitative or qualitative sustainability targets at this time.
Any revisions to the target and an explanation for those revisions (IFRS-S1 S1.51-g)	Targets have not been established or revised.
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.) (GRI 2-6-b-ii)	Heavy equipment repair and service parts. Hycroft Resources suppliers provide maintenance, repair and operational (MRO)
Affiliations: CDP 1.24 ESRS ESRS 2 SBM-1-40 (a) i to (a) ii, (b) to (c), 42 (c) GRI 102-9 WEF-MS-C Pillar	

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.

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.

Total estimated number of suppliers throughout its supply chain and in each tier (e.g., first tier, second tier)	467
Estimated number of first tier suppliers	467 In December 2024, Hycroft transitioned to an updated supply chain control system. All suppliers that had not had an active transaction in the past 18 months were removed from the system. This is the reason for the big drop in numbers.
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 • Consultancy Services <ul style="list-style-type: none"> • 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, research and engineering firms, and process equipment / development providers.
What is the nature of its business relationships with its suppliers	<ul style="list-style-type: none"> • Short-term • Contractual • Project-based • Event-based
The sector-specific characteristics of its supply chain	<ul style="list-style-type: none"> • Labour-intensive • Other, please specify <ul style="list-style-type: none"> • 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, Thousands)	4,750,000 In 2024, total goods and services spent on suppliers, contractors, service providers and rental equipment was approximately \$4.75M USD.
The geographic location of its suppliers	<ul style="list-style-type: none"> • United States of America • Canada

Environment

Climate Change

Transition Plan for Climate Change Mitigation

Describe the entity's transition plan, including policies and actions to mitigate climate change (GRI 102-1-a)

Hycroft is an exploration company. As we transition to mining operations in the future, we will make arrangements to identify opportunities, including policies and action plans, to mitigate climate changes.

Describe how the transition plan aligns with the latest scientific evidence on the effort needed to limit global warming to 1.5°C, including the source of the climate change-related scenarios used, and the methodologies and assumptions used to develop the transition plan (GRI 102-1-b)

There is no transition plan, at this time.

Report the total expenditure incurred by the implementation of the transition plan as monetary value (currency, Thousands) (GRI 102-1-c)	0
Report the total expenditure incurred by the implementation of the transition plan as a percentage of the total expenditure incurred in the reporting period (GRI 102-1-c)	Does Not Apply
Climate Change Adaptation Plan	
Describe the impacts on people and the environment associated with its climate change-related risks and opportunities and how they were considered in the development of the adaptation plan (GRI 102-1-a)	There is no Climate Change Adaption Plan at this time.
Explain, in the absence of an adaptation plan, why it does not exist, and describe the steps being taken to develop it and the expected time frame (GRI 102-1-d)	There is no Climate Change Adaption Plan at this time.
Just Transition	
Report the total number of employees who received training for up- and re-skilling (by employee type) (GRI 102-3-d-ii)	0
Report the total number of new workers who are not employees recruited (by gender) (GRI 102-3-e)	0
Report the total number of workers who are not employees whose work was terminated (by gender) (GRI 102-3-f)	0
Climate Change - Stewardship	
Strategy	
Have climate-related risks and opportunities influenced your organization's strategy and/or financial planning (GRI 14.2.2)	Yes
<i>Affiliations: CDP 3.1 CDSB REQ-01, REQ-02, REQ-03, REQ-05, REQ-06 GRI 14.2.2 TCFD Governance WEF-MS C Pillar 1 (Expanded Metrics & Disclosures) - Principles of Governance - Risk and Opportunity Oversight - Economic, environmental and social topics in capital allocation framework, Pillar 1: Principles of Governance - Risk and Opportunity Oversight - Integrating risk and opportunity into business process</i>	<p>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.</p> <p>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.</p>
Does your organization have a process for identifying, assessing, and responding to climate-related risks and opportunities (GRI 14.2.3)	No - important but not an immediate business priority
<i>Affiliations: CDP 2.2 CDSB REQ-01, REQ-02, REQ-03, REQ-05, REQ-06 GRI 14.2.3 TCFD Risk Management WEF-MS C Pillar 1 (Expanded Metrics & Disclosures) - Principles of Governance - Risk and Opportunity Oversight - Economic, environmental and social topics in capital allocation framework, Pillar 1: Principles of Governance - Risk and Opportunity Oversight - Integrating risk and opportunity into business process</i>	<p>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.</p>

<p>Is a system in place to calculate the financial implications or costs, or to make revenue projections (GRI 201-2.2)</p> <p><i>Affiliations: Bloomberg CLIMATE_CHG_OPPORTUNITIES CDP 2.2 CDSB REQ-01, REQ-02, REQ-03, REQ-05, REQ-06 ESRS ESRS 2 SBM-3-48 (a), (d) to (e), ESRS E1-18; E1-3-26; E1-9-64 GRI 13.2.2, 14.2.2 IFRS-S2 S2.10-a SASB FB-AG-440a.1.3 TCFD Strategy UN SDGs 13 (13.1) WEF-MS C Pillar 1 (Expanded Metrics & Disclosures) - Principles of Governance - Risk and Opportunity Oversight - Economic, environmental and social topics in capital allocation framework, Pillar 1: Principles of Governance - Risk and Opportunity Oversight - Integrating risk and opportunity into business process</i></p>	Yes
<p>Describe climate-related risks and opportunities that could reasonably be expected to affect the entity's prospects (IFRS-S2 S2.10-a)</p> <p><i>Affiliations: CSDS 2.10-a</i></p>	No. Risks exist, but none with potential to have a substantive financial or strategic impact on business.
Risk 1	
<p>Identified climate-related risk/opportunity (IFRS-S2 S2.10-b)</p> <p><i>Affiliations: CSDS 2.10-b</i></p>	Hycroft Mining has not identified that climate-related risks and opportunities that would influence the organization's strategy and financial planning. While the company recognizes climate considerations as important, it does not currently maintain a formal process for identifying, assessing, and responding to climate-related risks and opportunities, treating this as important but not an immediate business priority.
<p>Explain whether the entity considers the risk to be a climate-related physical risk or climate-related transition risk (IFRS-S2 S2.10-b)</p>	Climate-related physical risk
<p>Specify over which time horizons the effects of each climate-related risk and opportunity could reasonably be expected to occur (IFRS-S2 S2.10-c)</p> <p><i>Affiliations: CSDS 2.10-c</i></p>	Long term
<p>Explain how the entity defines 'short term', 'medium term' and 'long term' (IFRS-S2 S2.10-d)</p> <p><i>Affiliations: CSDS 2.10-d</i></p>	Risk timeframes are defined as short-term (3 to 6 months), medium term (6 months to 1 year) and long term (1 to 5 years). Mine life for Hycroft is currently 34 years at which time the mine will transition into care and reclamation.
<p>How are these definitions linked to the planning horizons used by the entity for strategic decision-making (IFRS-S2 S2.10-d)</p> <p><i>Affiliations: CSDS 2.10-d</i></p>	Mine life for Hycroft is currently 34 years at which time the mine will transition into care and reclamation.
Risk Assessments	
<p>Have you identified any inherent climate-related risks with the potential to have a substantive financial or strategic impact on your business (GRI 201-2)</p> <p><i>Affiliations: Bloomberg CLIMATE_RISKS CDSB REQ-01, REQ-02, REQ-03, REQ-05, REQ-06 ESRS ESRS 2 SBM-3-48 (a), (d) to (e), ESRS E1-18; E1-3-26; E1-9-64 IFRS-S2 S2.10-a TCFD Strategy UN SDGs 13 (13.1) WEF-MS C Pillar 1 (Expanded Metrics & Disclosures) - Principles of Governance - Risk and Opportunity Oversight - Economic, environmental and social topics in capital allocation framework, Pillar 1: Principles of Governance - Risk and Opportunity Oversight - Integrating risk and opportunity into business process</i></p>	No - risks exist, but none with potential to have a substantive financial or strategic impact on business
Opportunity Assessments	
<p>Have you identified any climate-related opportunities with the potential to have a substantive financial or strategic impact on your business (GRI 201-2-a)</p> <p><i>Affiliations: Bloomberg CLIMATE_CHG_OPPORTUNITIES CDSB REQ-01, REQ-02, REQ-03, REQ-05, REQ-06 ESRS ESRS 2 SBM-3-48 (a), (d) to (e), ESRS E1-18; E1-3-26; E1-9-64 GRI 13.2.2, 14.2.2 IFRS-S2 S2.10-a SASB FB-AG-440a.1.3 TCFD Strategy UN SDGs 13 (13.1) WEF-MS C Pillar 1 (Expanded Metrics & Disclosures) - Principles of Governance - Risk and Opportunity Oversight - Economic, environmental and social topics in capital allocation framework, Pillar 1: Principles of Governance - Risk and Opportunity Oversight - Integrating risk and opportunity into business process</i></p>	Other, please specify
<p>The amount of assets or business activities aligned with climate-related opportunities (IFRS-S2 S2.29-d)</p> <p><i>Affiliations: CSDS 2.29-d TCFD Metrics and Targets</i></p>	0.000
<p>The percentage of assets or business activities aligned with climate-related opportunities (IFRS-S2 S2.29-d)</p> <p><i>Affiliations: CSDS 2.29-d TCFD Metrics and Targets</i></p>	Does Not Apply

The total amount of capital expenditure, financing or investment deployed towards climate-related risks and opportunities (currency, Thousands) (IFRS-S2 S2.29-e)	0.000
<i>Affiliations: CSDS 2.29-e TCFD Metrics and Targets</i>	
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 (IFRS-S2 S2.13-a)	Minimal
<i>Affiliations: CSDS 2.13-a SASB FB-AG-440a.1.3 TCFD Strategy</i>	
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) (IFRS-S2 S2.14-a-i)	Future Process Plant design will seek to maximize recyclable water, minimize fuel consumption, and sell by-products including power back to the grid.
<i>Affiliations: CSDS 2.14-a-i ESRs E1-1-16 (b) TCFD Strategy</i>	
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) (IFRS-S2 S2.14-a-ii)	Future equipment selection will focus on minimizing fuel and power consumption.
<i>Affiliations: CSDS 2.14-a-ii ESRs E1-1-16 (b) SASB FB-AG-440a.1.5 TCFD Strategy</i>	
Entity has climate-related transition plan	False
Financial position, financial performance and cash flows	
Disclose the effects of climate-related risks and opportunities on the entity's financial position, financial performance and cash flows for the reporting period (current financial effects) (IFRS-S2 S2.15-a)	Risks and opportunities exist but there are currently no financial impacts to the financial position, financial performance, or cash flows.
<i>Affiliations: CSDS 2.15-a TCFD Strategy</i>	
How the entity expects its financial position to change over the short, medium and long term, given its strategy to manage climate-related risks and opportunities: (IFRS-S2 S2.16-c)	Risks and opportunities exist but there are currently no financial impacts to the financial position, financial performance, or cash flows.
<i>Affiliations: CSDS 2.16-c TCFD Strategy</i>	
Does the entity have investment and disposal plans (for example, plans for capital expenditure, major acquisitions and divestments, joint ventures, business transformation, innovation, new business areas, and asset retirements), including plans the entity is not contractually committed to	Mine closure and reclamation plan has been approved by US Bureau of Land Management (BLM) and Nevada Department of Environmental Protection.
Does the entity have planned sources of funding to implement its strategy	Yes
Explain why the entity has not provided quantitative information, if the entity determined that it need not provide quantitative information about the current or anticipated financial effects of a climate-related risk or opportunity (IFRS-S2 S2.21-a)	Quantitative information is dependent on the mine and process design parameters that are still in the process of being developed and have not been finalized.
<i>Affiliations: CSDS 2.21-a</i>	
Provide qualitative information about those financial effects, including identifying line items, totals and subtotals within the related financial statements that are likely to be affected, or have been affected, by that climate-related risk or opportunity, if quantitative information is not disclosed (IFRS-S2 S2.21-b)	Climate-related financial impacts and qualitative information are still in the process of being developed but there is no effect to the financial position, financial performance, or cash flows of the business.
<i>Affiliations: CSDS 2.21-b</i>	
Describe how the substantive changes in operations, revenue, or expenditure due to climate change affect or could affect the organization's workers and suppliers, its contributions to economic development, and its payments to governments (GRI 14.2.2)	Climate-related financial impacts and qualitative information are still in the process of being developed but there is no effect to the financial position, financial performance, or cash flows of the business.
Climate resilience	
Does the organization have a climate change adaptation plan in place (GRI 14.2.1)	No
<i>Affiliations: GRI 102-2</i>	
The analysis included a diverse range of climate-related scenarios, provide details	False

The entity used a climate-related scenario aligned with the latest international agreement on climate change	True
Risk management: Processes and policies	
Processes and related policies to identify, assess, prioritise and monitor risks (IFRS-S2 S2.25-a) <i>Affiliations: CSDS 2.25-a TCFD Strategy</i>	Climate-related risks are included in the risk registry with all of the other business and operational risks. Risk register is reviewed during Core Value Meetings that are conducted quarterly. Risks are assigned a priority based on available data and those with the highest risk evaluation are assigned to individuals to develop an action plan with specific dates for items to be completed. Those risks with a lower assigned evaluation are placed on a monitor board for further evaluation.
Provide information about the inputs and parameters the entity uses (for example, information about data sources and the scope of operations covered in the processes) (IFRS-S2 S2.25-a-i) <i>Affiliations: CSDS 2.25-a-i TCFD Strategy</i>	Climate-related risks are included in the risk registry with all of the other business and operational risks.
Entity uses climate-related scenario analysis to inform identification of climate-related risks	False
Provide information about how the entity assesses the nature, likelihood and magnitude of the effects of those risks (for example, whether the entity considers qualitative factors, quantitative thresholds or other criteria) (IFRS-S2 S2.25-a-iii) <i>Affiliations: CSDS 2.25-a-iii TCFD Strategy</i>	Sources for information about climate-related risks and opportunities include, but not limited to, federal bulletins, correspondence with regulatory agencies, local and regional government agencies, mining associations, partnerships, and industry publications.
Provide information about whether and how the entity prioritises climate-related risks relative to other types of risk (IFRS-S2 S2.25-a-iv) <i>Affiliations: CSDS 2.25-a-iv TCFD Strategy</i>	Climate-related risks are included in the risk registry with all of the other business and operational risks. All business risks are reviewed quarterly by senior management and reviewed annually by the Board of Directors.
Climate-related risks have been prioritised relative to other types of risk	True
Provide information about how the entity monitors climate-related risks (IFRS-S2 S2.25-a-v) <i>Affiliations: CSDS 2.25-a-v TCFD Strategy</i>	The Environmental Department has the responsibility to monitor climate-related risks. Any updates are communicated to the General Manager.
Provide information about whether and how the entity has changed the processes it uses compared with the previous reporting period (IFRS-S2 S2.25-a-vi) <i>Affiliations: CSDS 2.25-a-vi TCFD Strategy</i>	This process has not changed from the previous reporting period.
What is the processes the entity uses to identify, assess, prioritise and monitor climate-related opportunities (IFRS-S2 S2.25-b) <i>Affiliations: CSDS 2.25-b TCFD Strategy</i>	Environmental Department has the responsibility to identify, assess, and monitor climate-related opportunities. Any updates are communicated to the General Manager.
Provide information about whether and how the entity uses climate-related scenario analysis to inform its identification of climate-related opportunities (IFRS-S2 S2.25-b) <i>Affiliations: CSDS 2.25-b TCFD Strategy</i>	Climate-related scenario analysis will be conducted in the future, when specific data will be available for analysis.
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 (IFRS-S2 S2.25-c) <i>Affiliations: CSDS 2.25-c TCFD Strategy</i>	Climate-related risks and opportunities are included in the risk registry review with all of the other business and operational risks. This is conducted quarterly by Senior Management and annually by the Board of Directors.
Climate-related targets	
Has the entity set climate-related targets (note: details specific to GHG targets disclosures are separately) (IFRS-S2 S2.33) <i>Affiliations: CSDS 2.33 TCFD Metrics and Targets</i>	No
Disclose information about the entity's approach to setting and reviewing each target, and how it monitors progress against each target (IFRS-S2 S2.34) <i>Affiliations: CSDS 2.34 TCFD Metrics and Targets</i>	Hycroft is an exploration company and generation of green-house gases is dependent on the number of exploration targets included in the mine development plan. Key process related characteristics (including climate-related activities) are monitored by the Environmental Department and reported to Senior Management on a monthly basis.
Climate-related target and methodology are validated by third party	False
Disclose information about the entity's performance against each climate-related target and an analysis of trends or changes in the entity's performance (IFRS-S2 S2.34-d) <i>Affiliations: CSDS 2.34-d</i>	Baseline metrics and trends are still in the process of being developed. There have been no significant changes in Hycroft's performance to adhere to the company's policies, goals, and / or targets.

GHG Targets

Which greenhouse gases are covered by the target (IFRS-S2 S2.36-a)

Affiliations: TCFD Metrics and Targets

- Nitrous oxide (N₂O)
- Methane (CH₄)
- Carbon dioxide (CO₂)

There have been no targets set for greenhouse gases. Hycroft is an exploration company and will set GHG targets once mining and metallurgical extraction processes have been developed, designed, and constructed.

Gross or net greenhouse gas emissions target (IFRS-S2 S2.36-c)

Affiliations: CSDS 2.36-c | ESRS E1-4-34 (a) | IFRS-S1 S1.51-b | TCFD Metrics and Targets

Gross greenhouse gas emissions target

Emissions scopes covered by target (IFRS-S2 S2.36-b)

Affiliations: CSDS 2.36-c | ESRS E1-4-34 (a) | TCFD Metrics and Targets

Scope 1

Climate Change

GHG emissions reduction targets and progress

Gross Scope 1 target - Target year (GRI 102-4-a-i)

Not applicable

Gross Scope 1 target - Target emissions (% of base year emissions) (GRI 102-4-a-i)

0.000

Gross Scope 1 target - Target emissions (tonnes CO₂-e) (GRI 102-4-a-i)

0.000

Gross Scope 1 target - Are biogenic CO₂ emissions included in the target (GRI 102-4-b)

No

Gross Scope 1 target - Gases covered by the target (GRI 102-4-e)

- Carbon dioxide (CO₂)
- Methane (CH₄)
- Nitrous oxide (N₂O)

Hycroft is an exploration company and GHG targets have not been established.

What was the main reason for the reductions in emissions (GRI 102-4-j-i)

A result of the organization's initiatives

Report standards, methodologies, assumptions, and calculation tools used (GRI 102-4-k)

Hycroft uses the 2015 GHG Protocol Corporate Standard for all greenhouse gas calculations. Scope 1 emissions are calculated from fuel consumption at the Hycroft Mine site using EPA emission factors in accordance with the Greenhouse Gas Protocol. Scope 2 location-based emissions are calculated using the Nevada electricity grid power conversion factor as of January 2022 from carbonfootprint.com. All calculations utilize published emission factors and global warming potential rates from IPCC assessment reports based on a 100-year timeframe. As an exploration company, Hycroft has not established emission reduction targets at this time and will establish appropriate GHG targets upon initiation of construction and operations.

Greenhouse Gas Emissions

Scope 1

The total amount of gross global Scope 1 GHG emissions (CO₂-e) (tonnes) (GHG Protocol)

1,515.457

Affiliations: Bloomberg GHG, SCOPE_1 | ESRS E1-4-34 (b); E1-6-44 (a); 46; 50; AR 25 (b) and (c); AR 39 (a) to (d); AR 40; AR 43 (c) to (d) | GRI 102-5-a, 14.1.5, 305-1 | IFRS-S2 EM-EP-110a.1, EM-MD-110a.1, EM-MM-110a.1.1, EM-RM-110a.1, S2.32 | IPIECA A1 CCE-4, C1 CCE-4, C3 CCE-4 | SASB EM-EP-110a.1, EM-MD-110a.1, EM-RM-110a.1, FB-AG-110a.1, IF-EU-110a.1 | TCFD Metrics and Targets | UN SDGs 12 (12.1), 12 (12.2), 13 (13.2), 13 (13.3), 14 (14.3), 8 (8.4), 9 (9.2), 9 (9.4) | WEF-MSC Pillar 2: Planet - Climate Change - Greenhouse Gas (GHG) Emissions & TCFD implementation

Fuel related methane (CH₄) (tonnes)

0.052

Fuel related nitrous oxide (N₂O) (tonnes)

0.010

Carbon dioxide (CO₂) (tonnes CO₂-e)

1,511.177

Methane (CH₄) (tonnes CO₂-e)

1.300

Nitrous oxide (N₂O) (tonnes CO₂-e)

2.980

Hydrofluorocarbon-23 (CHF₃) (tonnes CO₂-e)

0.000

Hydrofluorocarbon-32 (CHF₂) (tonnes CO₂-e)

0.000

Sulphur hexafluoride (SF ₆) (tonnes CO ₂ -e)	0.000
Nitrogen trifluoride (NF ₃) (tonnes CO ₂ -e)	0.000
Perfluoro methane (CF ₄) (tonnes CO ₂ -e)	0.000
Perfluoro ethane (C ₂ F ₆) (tonnes CO ₂ -e)	0.000
Perfluoro butane (C ₄ F ₁₀) (tonnes CO ₂ -e)	0.000
Perfluoro hexane (C ₆ F ₁₄) (tonnes CO ₂ -e)	0.000
Biogenic non-CO ₂ GHG emissions produced by combustion or biodegradation of biomass from owned or controlled sources	0.000
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 (SASB EM-MM-110a.1.3)	84.5492%
<i>Affiliations: ESRS E1-6-48-b GRI 305-1 IFRS-S2 EM-EP-110a.1, EM-MD-110a.1, EM-MM-110a.1.3, EM-RM-110a.1, S2.32 IPIECA A1 CCE-4, C1 CCE-4, C3 CCE-4 SASB EM-EP-110a.1, EM-MD-110a.1, EM-RM-110a.1, FB-AG-110a.1, IF-EU-110a.1 TCFD Metrics and Targets UN SDGs 12 (12.1), 12 (12.2), 13 (13.2), 13 (13.3), 14 (14.3), 8 (8.4), 9 (9.2), 9 (9.4) WEF-MSc Pillar 2: Planet - Climate Change - Greenhouse Gas (GHG) Emissions & TCFD implementation</i>	
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) (SASB EM-MM-110a.1.4)	In 2024, there was a downturn in operations that led to a reduction in force and a reduction in on-site fuel consumption for both gasoline and diesel fuels. This led to an 32.6% reduction in overall GHG emissions.
<i>Affiliations: GRI 305-1 IFRS-S2 EM-EP-110a.1, EM-MD-110a.1, EM-MM-110a.1.4, EM-RM-110a.1, S2.29-a-iii-(3) IPIECA A1 CCE-4, C1 CCE-4, C3 CCE-4 SASB EM-EP-110a.1, EM-MD-110a.1, EM-RM-110a.1, FB-AG-110a.1, IF-EU-110a.1 TCFD Metrics and Targets UN SDGs 12 (12.1), 12 (12.2), 13 (13.2), 13 (13.3), 14 (14.3), 8 (8.4), 9 (9.2), 9 (9.4) WEF-MSc Pillar 2: Planet - Climate Change - Greenhouse Gas (GHG) Emissions & TCFD implementation</i>	
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. (SASB EM-MM-110a.1.5)	Not applicable.
<i>Affiliations: GRI 305-1 IFRS-S2 EM-EP-110a.1, EM-MD-110a.1, EM-MM-110a.1.5, EM-RM-110a.1, S2.32 IPIECA A1 CCE-4, C1 CCE-4, C3 CCE-4 SASB EM-EP-110a.1, EM-MD-110a.1, EM-RM-110a.1, FB-AG-110a.1, IF-EU-110a.1 TCFD Metrics and Targets UN SDGs 12 (12.1), 12 (12.2), 13 (13.2), 13 (13.3), 14 (14.3), 8 (8.4), 9 (9.2), 9 (9.4) WEF-MSc Pillar 2: Planet - Climate Change - Greenhouse Gas (GHG) Emissions & TCFD implementation</i>	
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 (SASB EM-MM-110a.1.6)	No changes were made in the calculation methodology from the base line reporting period of 2023.
<i>Affiliations: GRI 305-1 IFRS-S2 EM-EP-110a.1, EM-MD-110a.1, EM-MM-110a.1.6, EM-RM-110a.1, S2.32 IPIECA A1 CCE-4, C1 CCE-4, C3 CCE-4 SASB EM-EP-110a.1, EM-MD-110a.1, EM-RM-110a.1, FB-AG-110a.1, IF-EU-110a.1 TCFD Metrics and Targets UN SDGs 12 (12.1), 12 (12.2), 13 (13.2), 13 (13.3), 14 (14.3), 8 (8.4), 9 (9.2), 9 (9.4) WEF-MSc Pillar 2: Planet - Climate Change - Greenhouse Gas (GHG) Emissions & TCFD implementation</i>	
The entity may, where relevant, provide a breakdown of its emissions per resource produced or business unit (SASB EM-MM-110a.1.7)	There is no breakdown required in the emission calculations. The reduction in fuel consumption was uniformly applied to all operations.
<i>Affiliations: GRI 305-1 IFRS-S2 EM-EP-110a.1, EM-MD-110a.1, EM-MM-110a.1.7, EM-RM-110a.1, S2.32 IPIECA A1 CCE-4, C1 CCE-4, C3 CCE-4 SASB EM-EP-110a.1, EM-MD-110a.1, EM-RM-110a.1, FB-AG-110a.1 TCFD Metrics and Targets UN SDGs 12 (12.1), 12 (12.2), 13 (13.2), 13 (13.3), 14 (14.3), 8 (8.4), 9 (9.2), 9 (9.4) WEF-MSc Pillar 2: Planet - Climate Change - Greenhouse Gas (GHG) Emissions & TCFD implementation</i>	
Discuss short-term, medium-term and long-term strategy or plan to manage its Scope 1 greenhouse gas (GHG) emissions (SASB EM-MM-110a.2.1)	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 once we initiate construction and transition into the production stages of site development. 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.
<i>Affiliations: Bloomberg EMISSION_REDUCTION GRI 305-1, 305-5 IFRS-S2 EM-EP-110a.3, EM-MD-110a.2, EM-MM-110a.2.1, S2.32 IPIECA C2 CCE-2 SASB EM-EP-110a.3, EM-MD-110a.2, FB-AG-110a.2, IF-EU-110a.3 TCFD Metrics and Targets UN SDGs 12 (12.1), 12 (12.2), 13 (13.2), 13 (13.3), 14 (14.3), 8 (8.4), 9 (9.2), 9 (9.4) WEF-MSc Pillar 2: (Expanded metrics) Planet - Climate Change - Paris-aligned GHG emissions targets</i>	
Please discuss reduction emissions target(s) (if any) for Scope 1 in your company, how they are set and analyse the performance against the target(s) (SASB EM-MM-110a.2.2)	Hycroft has not established emission targets at this time.
<i>Affiliations: Bloomberg EMISSION_REDUCTION ESRS E1-4-30 to 33 GRI 305-1, 305-5 IFRS-S1 S1.46 IFRS-S2 EM-EP-110a.3, EM-MD-110a.2, EM-MM-110a.2.2, S.35, S2.36, S2.36-b SASB EM-EP-110a.3</i>	

EM-MD-110a.2, FB-AG-110a.2, IF-EU-110a.3 | TCFD Metrics and Targets | UN SDGs 12 (12.1), 12 (12.2), 13 (13.2), 13 (13.3), 14 (14.3), 8 (8.4), 9 (9.2), 9 (9.4) | WEF-MSC Pillar 2: (Expanded metrics) Planet - Climate Change - Paris-aligned GHG emissions targets

Report standards, methodologies, assumptions, and calculation tools used, including the source of the emission factors used (GRI 102-5-f)

Hycroft calculates Scope 1 greenhouse gas emissions using the 2015 GHG Protocol Corporate Standard. Emissions from fuel consumption are derived from gasoline and diesel consumption for site maintenance and exploration machinery. Emission factors and global warming potential rates are sourced from IPCC assessment reports based on a 100-year timeframe. The calculation methodology remains consistent with the baseline reporting period of 2023, with no changes to measurement approaches, inputs, or assumptions during the reporting period. Engineering calculations based on fuel consumption data are used to determine emissions across all seven greenhouse gases covered under the Kyoto Protocol.

Discuss the scope of strategies, plans, and/or reduction targets, such as whether they pertain differently to different business units, geographies, or emissions sources (SASB EM-MM-110a.2.4)

Not applicable since Hycroft is a single source and business unit.

Affiliations: Bloomberg EMISSION_REDUCTION | GRI 305-1, 305-5 | IFRS-S2 EM-EP-110a.3, EM-MD-110a.2, EM-MM-110a.2.4, S2.32 | SASB EM-EP-110a.3, EM-MD-110a.2, FB-AG-110a.2, IF-EU-110a.3 | TCFD Metrics and Targets | UN SDGs 12 (12.1), 12 (12.2), 13 (13.2), 13 (13.3), 14 (14.3), 8 (8.4), 9 (9.2), 9 (9.4) | WEF-MSC Pillar 2: (Expanded metrics) Planet - Climate Change - Paris-aligned GHG emissions targets

Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source (GRI 305-1-e)

Hycroft used published emission factors and global warming potential rates from IPCC assessment reports based on a 100-year timeframe.

Affiliations: ESRS E1-4 §34 (c); E1-6 §44 (a); §46; §50; §AR 25 (b) and (c); §AR 39 (a) to (d); §AR 40; AR §43 (c) to (d) | TCFD Metrics and Targets | UN SDGs 12 (12.4), 13 (13.1), 14 (14.3), 15 (15.2), 3 (3.9) | WEF-MSC Pillar 2: (Expanded metrics) Planet - Climate Change - Paris-aligned GHG emissions targets

What consolidation approach is used for emissions (GRI 305-1-f)

Not Applicable

Affiliations: ESRS E1 E1-4 §34 (c); E1-6 §44 (a); §46; §50; §AR 25 (b) and (c); §AR 39 (a) to (d); §AR 40; AR §43 (c) to (d) | TCFD Metrics and Targets | UN SDGs 12 (12.4), 13 (13.1), 14 (14.3), 15 (15.2), 3 (3.9) | WEF-MSC Pillar 2: (Expanded metrics) Planet - Climate Change - Paris-aligned GHG emissions targets

Standards, methodologies, assumptions, and/or calculation tools used and what was the reason they have been chosen (GRI 305-1-g)

Hycroft used the '2015 GHG Protocol Corporate Standard' for all calculations.

Affiliations: ESRS E1 E1-4-34 (c); E1-6-44 (a); 46; 50; AR 25 (b) and (c); AR 39 (a) to (d); AR 40; AR 43 (c) to (d) | IFRS-S2 S2.29-a-iii-(1), S2.29-a-iii-(2) | TCFD Metrics and Targets | UN SDGs 12 (12.4), 13 (13.1), 14 (14.3), 15 (15.2), 3 (3.9) | WEF-MSC Pillar 2: (Expanded metrics) Planet - Climate Change - Paris-aligned GHG emissions targets

Scope 2

If company specific calculations are not available, provide information following the gross location-based energy indirect (Scope 2) global greenhouse gas (GHG) emissions approach: (GHG Protocol)

Affiliations: CDP C7 | CDSB REQ02, REQ04 | GRI 13.1.3, 14.1.6, 305-2 | IFRS-S2 S2.29-a-i-(2) | IPIECA C2 CCE-4, C3 CCE-4 | TCFD Metrics and Targets | UN SDGs 12 (12.4), 13 (13.1), 14 (14.3), 15 (15.2), 3 (3.9) | WEF-MSC Pillar 2: Planet - Climate Change - Greenhouse Gas (GHG) Emissions & TCFD implementation

Does the company purchase externally supplied energy (grid electricity) (GHG Protocol)

Yes

Affiliations: GRI 305-2 | IFRS-S2 S2.29-a-i-(2) | TCFD Metrics and Targets | UN SDGs 12 (12.4), 13 (13.1), 14 (14.3), 15 (15.2), 3 (3.9) | WEF-MSC Pillar 2: Planet - Climate Change - Greenhouse Gas (GHG) Emissions & TCFD implementation

Report the total electricity purchased from external suppliers for the reporting year in gigajoules (GJ)

23,419,278

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 (CO₂-e) (tonnes)

2,114,242

Does the company purchase externally supplied heat (GHG Protocol)

No

Affiliations: GRI 305-2 | IFRS-S2 S2.29-a-i-(2) | TCFD Metrics and Targets | UN SDGs 12 (12.4), 13 (13.1), 14 (14.3), 15 (15.2), 3 (3.9) | WEF-MSC Pillar 2: Planet - Climate Change - Greenhouse Gas (GHG) Emissions & TCFD implementation

Does the company purchase externally supplied steam (GHG Protocol)

No

Affiliations: GRI 305-2 | IFRS-S2 S2.29-a-i-(2) | TCFD Metrics and Targets | UN SDGs 12 (12.4), 13 (13.1), 14 (14.3), 15 (15.2), 3 (3.9) | WEF-MSC Pillar 2: Planet - Climate Change - Greenhouse Gas (GHG) Emissions & TCFD implementation

Does the company purchase externally supplied cooling (GHG Protocol)	No
<i>Affiliations: GRI 305-2 IFRS-S2 S2.29-a-i-(2) IPIECA C2 CCE-4, C3 CCE-4 TCFD Metrics and Targets UN SDGs 12 (12.4), 13 (13.1), 14 (14.3), 15 (15.2), 3 (3.9) WEF-MSC Pillar 2: Planet - Climate Change - Greenhouse Gas (GHG) Emissions & TCFD implementation</i>	
Biogenic non-CO2 GHG emissions from electricity use (tonnes CO2-e) (GHG Protocol)	0.000
<i>Affiliations: GRI 102-6-a-ii, 102-6-c</i>	
The total amount of gross location based global Scope 2 GHG emissions (tonnes CO2-e) (GHG Protocol)	2,114.242
<i>Affiliations: Bloomberg GHG, SCOPE_2 ESRS E1-4-34 (b)-E1-6-44 (b) GRI 102-6-a, 13.1.3, 305-2 IFRS-S2 S2.29-a-i-(2) IPIECA C2 CCE-4, C3 CCE-4 TCFD Metrics and Targets UN SDGs 12 (12.4), 13 (13.1), 14 (14.3), 15 (15.2), 3 (3.9) WEF-MSC Pillar 2: Planet - Climate Change - Greenhouse Gas (GHG) Emissions & TCFD implementation</i>	
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) (SASB EM-MM-110a.1.6)	In 2024, there was a downturn in operations that led to a reduction in electricity consumption. This carried over into 2025 and led to an 36.4% reduction in overall Scope 2 GHG emissions.
Breakdown of gross location-based Scope 2 GHG emissions: CO2 (tonnes) (GRI 102-6-b)	0.000
Breakdown of gross location-based Scope 2 GHG emissions: CH4 (tonnes) (GRI 102-6-b)	0.000
Breakdown of gross location-based Scope 2 GHG emissions: N2O (tonnes) (GRI 102-6-b)	0.000
Total amount of Scope 2 GHG emissions (CO2-e) that are covered under emissions-limiting regulations (tonnes) for the jurisdiction in which the company is working. (GRI 305-2)	0.000
<i>Affiliations: IPIECA C2 CCE-4, C3 CCE-4 TCFD Metrics and Targets UN SDGs 12 (12.4), 13 (13.1), 14 (14.3), 15 (15.2), 3 (3.9) WEF-MSC Pillar 2: Planet - Climate Change - Greenhouse Gas (GHG) Emissions & TCFD implementation</i>	
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 (GRI 305-2)	0.0000%
<i>Affiliations: IPIECA C2 CCE-4, C3 CCE-4 TCFD Metrics and Targets UN SDGs 12 (12.4), 13 (13.1), 14 (14.3), 15 (15.2), 3 (3.9) WEF-MSC Pillar 2: Planet - Climate Change - Greenhouse Gas (GHG) Emissions & TCFD implementation</i>	
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 (GRI 305-2)	There are no plans to manage Scope 2 emissions at this time.
<i>Affiliations: Bloomberg EMISSION_REDUCTION TCFD Metrics and Targets UN SDGs 12 (12.4), 13 (13.1), 14 (14.3), 15 (15.2), 3 (3.9) WEF-MSC Pillar 2: (Expanded metrics) Planet - Climate Change - Paris-aligned GHG emissions targets</i>	
Please discuss reduction emissions target(s) (if any) for Scope 2 in your company, how they are set and analyse the performance against the target(s) (SASB EM-MM-110a.2.2)	Hycroft does not have a reduction target for Scope 2 GHG emissions.
<i>Affiliations: Bloomberg EMISSION_REDUCTION ESRS E1-4-30 to 33 GRI 305-2, 305-5:13.1.6 IFRS-S1 S1.46 IFRS-S2 EM-EP-110a.3, EM-MD-110a.2, EM-MM-110a.2.2, S2.35, S2.36, S2.36-b SASB EM-EP-110a.3, EM-MD-110a.2 TCFD Metrics and Targets UN SDGs 12 (12.1), 12 (12.2), 13 (13.2), 13 (13.3), 14 (14.3), 8 (8.4), 9 (9.2), 9 (9.4) WEF-MSC Pillar 2: (Expanded metrics) Planet - Climate Change - Paris-aligned GHG emissions targets</i>	
Report standards, methodologies, assumptions, and calculation tools used, including the source of the emission factors used (GRI 102-6-f)	Hycroft calculates Scope 2 GHG emissions using the gross location-based approach based on purchased grid electricity. The company applied the 2015 GHG Protocol Corporate Standard methodology and utilized published emission factors and global warming potential rates from IPCC assessment reports based on a 100-year timeframe. For the Nevada electricity grid conversion, Hycroft used the power conversion factor current as of January 2022 from carbonfootprint.com. The total electricity purchased from external suppliers of 36,825.768 gigajoules was converted using a conversion factor of 0.325, resulting in total Scope 2 GHG emissions of 3,324.551 tonnes CO2-e. No changes were made to the calculation methodology from the baseline reporting period of 2023, and emissions reductions of 8.4 percent from the prior year were primarily attributable to operational downturns resulting in reduced workforce and decreased electricity consumption.
<i>Affiliations: ESRS E1-6-AR 39-b GRI 305-2-g IFRS-S2 S2.29-a-iii-(1), S2.29-a-iii-(2)</i>	
Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source (GRI 305-2-e)	Hycroft used published emission factors and global warming potential rates from IPCC

Scope 3

Is the Organization disclosing gross "other indirect" global Scope 3 greenhouse gas (GHG) emissions to the atmosphere of the seven GHGs covered under the Kyoto Protocol (tonnes CO₂-e)? These emissions are not included in Scope 2 and occur outside of the organization including both upstream and downstream emissions, e.g., transporting fuel to market, or transporting fuel to the plant or site to create your product, or transporting your product to market (GHG Protocol)

No

Affiliations: CDP C7 | CDSB REQ02, REQ04 | GRI 305-3-a | IPIECA A2 CCE-4 | TCFD Metrics and Targets | UN SDGs 12 (12.4), 13 (13.1), 14 (14.3), 15 (15.2), 3 (3.9) | WEF-MSC Pillar 2: Planet - Climate Change - Greenhouse Gas (GHG) Emissions & TCFD implementation

Scope 1, 2 and 3 - Current period

Absolute gross Scope 1 GHG emissions (tonnes of CO ₂ -e) (IFRS-S2 S2.29-a-i)	1,515.457
Absolute gross location-based Scope 2 GHG emissions (tonnes of CO ₂ -e) (IFRS-S2 S2.29-a-i)	2,114.242
Absolute gross market-based Scope 2 GHG emissions (tonnes of CO ₂ -e) (IFRS-S2 S2.29-a-i)	0.000
Absolute gross Scope 1 and 2 GHG emissions (location based) (tonnes of CO ₂ -e) (IFRS-S2 S2.29-a-i)	3,629.699
Absolute gross Scope 1 and 2 GHG emissions (market based) (tonnes of CO ₂ -e) (IFRS-S2 S2.29-a-i)	1,515.457

Scope 1, 2 and 3 - Prior period

Absolute gross Scope 1 GHG emissions (tonnes of CO ₂ -e) (IFRS-S2 S2.29-a-i)	0.000
Absolute gross location-based Scope 2 GHG emissions (tonnes of CO ₂ -e) (IFRS-S2 S2.29-a-i)	0.000
Absolute gross market-based Scope 2 GHG emissions (tonnes of CO ₂ -e) (IFRS-S2 S2.29-a-i)	0.000
Absolute gross Scope 1 and 2 GHG emissions (location based) (tonnes of CO ₂ -e) (IFRS-S2 S2.29-a-i)	0.000
Absolute gross Scope 1 and 2 GHG emissions (market based) (tonnes of CO ₂ -e) (IFRS-S2 S2.29-a-i)	0.000

Measurement and Other Disclosures

Approach used to measure GHG emissions (IFRS-S2 S2.29-a-iii-1)

Affiliations: IFRS-S2 S2.29-a-iii-(3)

Hycroft utilizes the 2015 GHG Protocol Corporate Standard for all greenhouse gas emissions calculations. Scope 1 emissions are calculated from fuel consumption at the Hycroft Mine site using EPA emission factors in accordance with the Greenhouse Gas Protocol. Scope 2 emissions are calculated using the location-based approach, with grid electricity conversion factors based on the Nevada electricity grid power conversion factor as of January 2022. All calculations employ published emission factors and global warming potential rates from IPCC assessment reports based on a 100-year timeframe. The company has implemented no changes to its calculation methodology from the baseline reporting period, ensuring consistency and comparability of emissions data across reporting periods.

The reason why the entity has chosen the measurement approach, inputs and assumptions it uses to measure its greenhouse gas emissions (IFRS-S2 S2.29-a-iii-2)

Hycroft uses the 2015 GHG Protocol Corporate Standard for all greenhouse gas emissions calculations. GHG emissions values are calculated from fuel consumption at the Hycroft Mine site, with conversion factors based on EPA emission factors in accordance with the Greenhouse Gas Protocol. Published emission factors and global warming potential rates from IPCC assessment reports based on a 100-year timeframe are applied to ensure consistency with internationally recognized methodologies. This approach was selected to provide a reliable, transparent, and standardized framework aligned with industry best practices for measuring and reporting emissions across Scope 1 and Scope 2 sources.

Changes to measurement approach, inputs and assumptions used to measure GHG emissions and reasons for changes (IFRS-S2 S2.29-a-iii-3)

There have been no changes in measurement sources, input values, or assumptions in measuring GHG emissions.

Method and measurement approach used in calculating GHG emissions, if not measured in accordance with GHG Protocol (IFRS-S2 S2.B26-b)

Hycroft uses the 2015 GHG Protocol Corporate Standard for all greenhouse gas calculations. GHG emissions are calculated from fuel consumption at the Hycroft Mine site using EPA emission factors in accordance with the Greenhouse Gas Protocol. Calculations are

	based on fuel consumption for drilling equipment and light vehicle transportation during the reporting period. Hycroft used published emission factors and global warming potential rates from IPCC assessment reports based on a 100-year timeframe. No changes were made to the calculation methodology from the baseline reporting period.	
Emission factors used in calculating GHG emissions (IFRS-S2 S2.B26-c)	Hycroft uses published emission factors and global warming potential rates from IPCC assessment reports based on a 100-year timeframe in accordance with the 2015 GHG Protocol Corporate Standard. GHG calculations utilize EPA emission factors for Scope 1 emissions, while Scope 2 emissions are calculated using the Nevada electricity grid power conversion factor as of January 2022.	
Any contractual instruments that inform understanding of Scope 2 GHG emissions (IFRS-S2 2.29-a-v)	No	
Effects of significant events and changes in circumstances relevant to GHG emissions that occur between reporting dates in value chain and general purpose financial reports (IFRS-S2 S2.B19-c)	Hycroft Mining did not experience significant events or changes in circumstances affecting greenhouse gas emissions between the 2024 reporting date and the 2025 reporting period. The company remains in the exploration and development phase with operations consistent with the prior year, and no material changes to the value chain or operational scope have occurred that would impact GHG emissions reporting.	
GHG Removals in The Value Chain		
Removals		
Report the total Scope 1 GHG removals in metric tons of CO2 equivalent, excluding any GHG trades, and a breakdown of this total by each storage pool (GRI 102-9-a)	There were no GHG removed from this analysis.	
For each type of storage pool, describe how quality criteria are monitored to manage the risk of non-permanence (GRI 102-9-b)	Hycroft does not currently operate tailings storage facilities or storage pools. Prior to becoming operational, Hycroft will develop and implement monitoring protocols consistent with industry standards to manage quality criteria and ensure permanence of any future storage facilities, subject to regulatory approval and requirements established by the Nevada Department of Environmental Protection and relevant federal agencies.	
Report the intended use of GHG removals (GRI 102-9-c)	Hycroft has not reported the use of GHG removals during the reporting period. The company's greenhouse gas management approach focuses on monitoring and reducing emissions from exploration and operational activities.	
Describe the impacts on people and the environment from its Scope 1 GHG removals and the actions taken to manage them, including for: (GRI 102-9-d)	Hycroft has not reported the use of GHG removals during the reporting period. The company's greenhouse gas management approach focuses on monitoring and reducing emissions from exploration and operational activities.	
	Workers, local communities, and Indigenous Peoples	Not applicable
	Biodiversity	Not applicable
Report standards, methodologies, assumptions, and calculation tools used (GRI 102-9-e)	Not applicable	
Carbon Offset and Pricing		
Credits		
Did the entity use or plan to use carbon credits to offset greenhouse gas emissions to achieve any net greenhouse gas emissions target (IFRS-S2 S2.36-e) <i>Affiliations: CSDS 2.36-e GRI 305-1.2 TCFD Metrics and Targets</i>	Hycroft has not established emission targets at this time and does not currently use or plan to use carbon credits to offset greenhouse gas emissions.	
Internal carbon pricing		
Provide an explanation of whether and how the entity is applying a carbon price in decision-making (for example, investment decisions, transfer pricing and scenario analysis) (IFRS-S2 S2.29-f-i) <i>Affiliations: ESRS E1-8-62 TCFD Metrics and Targets</i>	Hycroft is an exploration and development stage company and has not yet applied carbon pricing in its decision-making processes, investment decisions, transfer pricing, or scenario analysis.	
Entity applies carbon price in decision-making (IFRS-S2 S2.29-f-i)	False	

The carbon price for each metric tonne of greenhouse gas emissions the entity uses to assess the costs of its greenhouse gas emissions (currency/tonne) (IFRS-S2 S2.29-f-ii)

0

Affiliations: ESRS E1-8-63-c | TCFD Metrics and Targets

Air Emissions

Emissions Management

Disclose the management approach regarding Emissions (GRI MM Supplement G4-DMA)

The 2025 Hycroft Air Emissions Report was received and approved by the Nevada Department of Environmental Protection Agency - SLEIS.

Affiliations: Bloomberg EMISSION_REDUCTION | CDP C7 | CDSB REQ02, REQ04 | SASB EM-MM-110a.2 | WEF-MSC Pillar 2: (Expanded metrics) - Planet - Air Pollution - Air Pollution

Confirmation number: S20260226180749-FA0390-R2025



2025 Air Emission Report

Emissions of air pollutants that are released into the atmosphere - carbon monoxide, reported as CO (tonnes) (SASB EM-MM-120a.1.2)

0.003

Affiliations: Bloomberg CARBON_MONOXIDE_EMISSIONS | GRI 14.3.2, 305-6, 305-7 | IPIECA C1 ENV-6 | SASB EM-EP-120a.1, EM-MD-120a.1, EM-RM-120a.1, IF-EU-120a.1, RR-BI-120a.1 | UN SDGs 12 (12.1), 12 (12.2), 12 (12.4), 14 (14.3), 3 (3.9), 8 (8.4), 9 (9.2), 9 (9.4) | WEF-MSC Pillar 2: (Expanded metrics) - Planet - Air Pollution - Air Pollution

Emissions of air pollutants that are released into the atmosphere - oxides of nitrogen (NOx), reported as NOx (tonnes) (SASB EM-MM-120a.1.3)

0.014

Affiliations: Bloomberg NOX_EMISSIONS | GRI 14.3.2, 305-6, 305-7 | IPIECA C1 ENV-5 | SASB EM-EP-120a.1, EM-MD-120a.1, EM-RM-120a.1, IF-EU-120a.1, RR-BI-120a.1 | UN SDGs 12 (12.1), 12 (12.2), 12 (12.4), 14 (14.3), 3 (3.9), 8 (8.4), 9 (9.2), 9 (9.4) | WEF-MSC Pillar 2: (Expanded metrics) - Planet - Air Pollution - Air Pollution

Emissions of air pollutants that are released into the atmosphere - oxides of sulphur (SOx), reported as SOx (tonnes) (SASB EM-MM-120a.1.4)

0.000

Affiliations: Bloomberg SULPHUR_OXIDE_EMISSIONS | GRI 14.3.2, 305-6, 305-7 | IPIECA C1 ENV-5 | SASB EM-EP-120a.1, EM-MD-120a.1, EM-RM-120a.1, IF-EU-120a.1, RR-BI-120a.1 | UN SDGs 12 (12.1), 12 (12.2), 12 (12.4), 14 (14.3), 3 (3.9), 8 (8.4), 9 (9.2), 9 (9.4) | WEF-MSC Pillar 2: (Expanded metrics) - Planet - Air Pollution - Air Pollution

Emissions of air pollutants that are released into the atmosphere - Particulate Matter 10 micrometres or less in diameter (PM₁₀), reported as PM₁₀ (tonnes) (SASB EM-MM-120a.1.5)

0.001

Affiliations: Bloomberg PARTICULATE_EMISSIONS | GRI 14.3.2, 305-6, 305-7 | IPIECA C1 ENV-5 | SASB EM-EP-120a.1, EM-MD-120a.1, EM-RM-120a.1, IF-EU-120a.1, RR-BI-120a.1 | UN SDGs 12 (12.1), 12 (12.2), 12 (12.4), 14 (14.3), 3 (3.9), 8 (8.4), 9 (9.2), 9 (9.4) | WEF-MSC Pillar 2: (Expanded metrics) - Planet - Air Pollution - Air Pollution

Emissions of air pollutants that are released into the atmosphere - lead and lead compounds, reported as Pb (tonnes) (SASB EM-MM-120a.1.6)

0.000

Affiliations: GRI 14.3.2, 305-6, 305-7 | IPIECA C1 ENV-6 | SASB EM-EP-120a.1, EM-MD-120a.1, EM-RM-120a.2, IF-EU-120a.1, RR-BI-120a.1 | UN SDGs 12 (12.1), 12 (12.2), 12 (12.4), 14 (14.3), 3 (3.9), 8 (8.4), 9 (9.2), 9 (9.4) | WEF-MSC Pillar 2: (Expanded metrics) - Planet - Air Pollution - Air Pollution

Emissions of air pollutants that are released into the atmosphere - mercury and mercury compounds, reported as Hg (tonnes) (SASB EM-MM-120a.1.7)

0.000

Affiliations: GRI 14.3.2, 305-6, 305-7 | IPIECA C1 ENV-7 | SASB EM-EP-120a.1, EM-MD-120a.1, EM-RM-120a.3, IF-EU-120a.1, RR-BI-120a.1 | UN SDGs 12 (12.1), 12 (12.2), 12 (12.4), 14 (14.3), 3 (3.9), 8 (8.4), 9 (9.2), 9 (9.4) | WEF-MSC Pillar 2: (Expanded metrics) - Planet - Air Pollution - Air Pollution

Emissions of air pollutants that are released into the atmosphere - non-methane Volatile Organic Compounds (VOCs) (tonnes) (SASB EM-MM-120a.1.8)

0.279

Affiliations: Bloomberg VOC_EMISSIONS | GRI 14.3.2, 305-6, 305-7 | SASB EM-EP-120a.1, EM-MD-120a.1, EM-RM-120a.1, IF-EU-120a.1, RR-BI-120a.1 | UN SDGs 12 (12.1), 12 (12.2), 12 (12.4), 14 (14.3), 3 (3.9), 8 (8.4), 9 (9.2), 9 (9.4) | WEF-MSC Pillar 2: (Expanded metrics) - Planet - Air Pollution - Air Pollution

Discuss the calculation methodology for emissions disclosure and specify if the data is from: (SASB EM-MM-120a.1.9)

Engineering calculations

Affiliations: GRI 305-6, 305-7 | IFRS-S2 EM-MM-120a.1.9 | IPIECA C1 ENV-5 | SASB EM-EP-120a.1, EM-MD-120a.1, EM-RM-120a.1, IF-EU-120a.1, RR-BI-120a.1 | UN SDGs 12 (12.1), 12 (12.2), 12 (12.4), 14 (14.3), 3 (3.9), 8 (8.4), 9 (9.2), 9 (9.4) | WEF-MSC Pillar 2: (Expanded metrics) - Planet - Air Pollution - Air Pollution

Energy

Energy Policies and Commitments

Describe how its energy-related policies and commitments contribute to energy consumption reduction, energy efficiency, and the transition to renewable energy sources (GRI 103-1-a)

Hycroft has not established formal energy-related policies or commitments specifically targeting energy consumption reduction, energy efficiency, or renewable energy transition. As an exploration-stage company, current energy use is predominantly from diesel fuel consumption in site maintenance and exploration machinery. The company recognizes the importance of exploring alternative measures to minimize energy consumption and greenhouse gas emissions as it transitions from exploration to construction and production phases. Energy management strategies will be further developed and implemented upon advancement to operational status, with baseline reestablishment anticipated in 2028 when construction and operations commence.

Describe the impacts on the economy, environment, and people that may result from its energy consumption and the transition to renewable energy source (GRI 103-1-b)

Hycroft's energy consumption is primarily derived from non-renewable fuel sources used in exploration and site maintenance activities. Current energy impacts are limited given the company's exploration stage, with total energy consumption of 46,443.6 gigajoules in 2025, of which less than one percent was renewable energy. As Hycroft transitions from exploration toward construction and operational phases, energy demand is anticipated to increase substantially.

Energy Consumption and Self-generation Within The Organization

Report total fuel consumption within the organization (in joules) and a breakdown of this total by: (GRI 103-2-a)

22,952,600,002,295.258

Fuel from renewable sources (in joules)

0.000

Fuel from non-renewable energy sources (in joules)

22,952,600,002,295.258

Gas = 66,632 gallons = 8,779.4 Gigajoules
 Dyed Diesel = 39,735 gallons = 5,821.9 Gigajoules
 Clear Diesel = 24,500 gallons = 3,589.7 Gigajoules
 Propane = 47,258 gallons = 4,761.6 Gigajoules
 Total = 22,952.6 Gigajoules

Activity 1

Name of the activity (GRI 103-2-a-ii)

Gas - Light vehicles, light plants, compressors, and exploration gas consumption

Consumption of renewable fuel (in joules) (GRI 103-2-a-ii)

0.000

Consumption of non-renewable fuel (in joules) (GRI 103-2-a-ii)

8,779,400,000,877.939

Activity 2

Name of the activity (GRI 103-2-a-ii)

Dyed Diesel - Exploration and Off-Road Equipment

Consumption of renewable fuel (in joules) (GRI 103-2-a-ii)

0.000

Consumption of non-renewable fuel (in joules) (GRI 103-2-a-ii)

5,821,900,000,582.189

Activity 3

Name of the activity (GRI 103-2-a-ii)

Clear Diesel - Exploration equipment

Consumption of renewable fuel (in joules) (GRI 103-2-a-ii)

0.000

Consumption of non-renewable fuel (in joules) (GRI 103-2-a-ii)

3,589,700,000,358.970

Activity 4

Name of the activity (GRI 103-2-a-ii)

Propane - Forklifts and mobile equipment

Consumption of renewable fuel (in joules) (GRI 103-2-a-ii)

0.000

Consumption of non-renewable fuel (in joules) (GRI 103-2-a-ii)

4,761,600,000,476.160

Total purchased electricity, heating, cooling, and steam consumption within the organization (in joules), and a breakdown of this total by: (GRI 103-2-b)	23,491,000,002,349.100
Renewable sources (in joules)	0.000
Renewable sources (in joules) - electricity purchased	0.000
Renewable sources (in joules) - heating purchased	0.000
Renewable sources (in joules) - cooling purchased	0.000
Renewable sources (in joules) - steam purchased	0.000
Non-renewable energy sources (in joules)	23,491,000,002,349.100
Non-renewable sources (in joules) - electricity purchased	23,491,000,002,349.100
Non-renewable sources (in joules) - heating purchased	0.000
Non-renewable sources (in joules) - cooling purchased	0.000
Non-renewable sources (in joules) - steam purchased	0.000
Total self-generated renewable electricity, heating, cooling, and steam consumption within the organization (in joules) (GRI 103-2-c)	0.000
Self-generated renewable electricity consumption within the organization (in joules)	0.000
Consumption Activity 1	
Name of the activity (GRI 103-2-c)	Hycroft's energy management encompasses fuel consumption from exploration and maintenance activities including gasoline for light vehicles, light plants and compressors, dyed diesel for exploration and off-road equipment, clear diesel for exploration equipment, and propane for forklifts and mobile equipment, along with purchased electricity from Nevada Energy.
Self-generated renewable electricity consumption for the activity (in joules)	0.000
Total self-generated electricity, heating, cooling, and steam sold (in joules) (GRI 103-2-d)	0.000
Self-generated renewable energy sources sold (in joules)	0.000
Self-generated non-renewable energy sources sold (in joules)	0.000
Total NET energy consumption within the organization (in joules) (GRI 103-2)	46,443,600,004,644.360
<i>Affiliations: Bloomberg ENERGY_CONSUMPTION ESR5 E1-5-37; 38; AR 32 (a), (c), (e) and (f) GRI 14.1.2, 302-1-e IPIECA C1 CCE-6 SASB EM-MM-110a.1, EM-MM-130a.1, FB-AG-130a.1, TC-SI-130a.1 UN SDGs 12 (12.2), 13 (13.1), 7 (7.2), 7 (7.3), 8 (8.4)</i>	
Are the contractual instruments used to disclose information on purchased electricity, heating, cooling, and steam consumption (GRI 103-2-e)	Yes
Describe how the contractual instruments adhere to quality criteria to ensure accuracy and consistency	Hycroft relies on contractual instruments with energy suppliers to obtain accurate consumption data for purchased electricity, heating, cooling, and steam. These instruments establish clear terms for metering, reporting, and data validation to ensure reliability and consistency in energy consumption records. The company maintains documented supplier agreements that specify measurement methodologies, billing cycles, and data quality standards aligned with industry practices. All purchased energy data is reconciled against supplier invoices and internal consumption logs to verify accuracy. This approach supports the integrity of Hycroft's energy management reporting and enables meaningful tracking of energy consumption across operations.
Report standards, methodologies, assumptions, and calculation tools used, including the source of the conversion factors used (GRI 103-2-f)	Hycroft calculates total energy consumption by aggregating fuel consumption data and purchased electricity usage during the reporting period. Fuel consumption figures are derived from operational records of diesel, gasoline and propane used in site maintenance and exploration activities, while purchased electricity data is obtained from utility billing records from Nevada Energy. All energy values
<i>Affiliations: GRI 302-2-b</i>	

are converted to gigajoules using standard conversion factors.

Energy Consumption

Total energy consumption within the organization (gigajoules, GJ) (GRI 302-1-e)	5,295,352.038
<i>Affiliations: Bloomberg ENERGY_CONSUMPTION ESRS E1-5-37; 38; AR 32 (a), (c), (e) and (f) GRI 103-2, 14.1.2, 305-1, 305-2 IPIECA C1 CCE-6 SASB EM-MM-110a.1, EM-MM-130a.1, FB-AG-130a.1, TC-SI-130a.1 UN SDGs 12 (12.2), 13 (13.1), 7 (7.2), 7 (7.3), 8 (8.4)</i>	
Report the energy owned and controlled by the organization consumed in gigajoules for the following (GRI 302-1-c)	23,014.724
<i>Affiliations: ESRS E1-5-37; 38; AR 32 (a), (c), (e) and (f) GRI 14.1.2, 305-1, 305-2 IPIECA C1 CCE-6 SASB EM-MM-110a.1, EM-MM-130a.1, FB-AG-130a.1, TC-SI-130a.1 UN SDGs 12 (12.2), 13 (13.1), 7 (7.2), 7 (7.3), 8 (8.4)</i>	
Electricity purchased/generated for consumption (gigajoules, GJ)	0.000
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)	23,014.724
Renewable fuel consumed (gigajoules, GJ)	0.000
Fuel types used from non-renewable sources (GRI 302-1-a)	Gas, Diesel Fuel (Dyed and Clear), and Propane
<i>Affiliations: ESRS E1-5-37; 38; AR 32 (a), (c), (e) and (f) GRI 103-2-a-i, 14.1.2 IPIECA A1 CCE-6 SASB FB-AG-130a.1, TC-SI-130a.5 UN SDGs 12 (12.2), 13 (13.1), 7 (7.2), 7 (7.3), 8 (8.4)</i>	
Fuel types used from renewable sources (GRI 302-1-b)	None
<i>Affiliations: ESRS E1-5-37; 38; AR 32 (a), (c), (e) and (f) GRI 14.1.2 IPIECA A1 CCE-6 SASB FB-AG-130a.1, TC-SI-130a.5 UN SDGs 12 (12.2), 13 (13.1), 7 (7.2), 7 (7.3), 8 (8.4)</i>	
Report energy owned and controlled by the organization sold in gigajoules and report the totals for each (GRI 302-1-d)	0.000
<i>Affiliations: ESRS E1-5-37; 38; AR 32 (a), (c), (e) and (f) GRI 14.1.2 IPIECA A1 CCE-6 SASB FB-AG-130a.1, TC-SI-130a.5 UN SDGs 12 (12.2), 13 (13.1), 7 (7.2), 7 (7.3), 8 (8.4)</i>	
Electricity sold (gigajoules, GJ)	0.000
Heating sold (gigajoules, GJ)	0.000
Cooling sold (gigajoules, GJ)	0.000
Steam sold (gigajoules, GJ)	0.000
Report the standards, methodologies, assumptions and/or calculation tools used (GRI 302-1-f)	Hycroft's 2025 energy consumption calculations were based on fuel consumption data for drilling equipment and light vehicle transportation during the reporting period. The organization used the 2015 GHG Protocol Corporate Standard methodology for all calculations.
<i>Affiliations: ESRS E1-5-37; 38; AR 32 (a), (c), (e) and (f) GRI 103-2-j, 14.1.2 SASB TC-SI-130a.12 UN SDGs 12 (12.2), 13 (13.1), 7 (7.2), 7 (7.3), 8 (8.4)</i>	
Source of the conversion factors used (GRI 302-1-g)	Hycroft used EPA conversion factors aligned with the 2015 GHG Protocol Corporate Standard to quantify energy consumption. Total energy consumption in 2025 was driven primarily by non-renewable fuel consumption of 46,443.6 gigajoules from on-site drilling equipment and vehicle transportation, with no renewable energy or grid electricity purchases. No energy was generated, purchased, or sold as heating, cooling, or steam during the reporting period.
<i>Affiliations: ESRS E1-5-37; 38; AR 32 (a), (c), (e) and (f) GRI 14.1.2 SASB TC-SI-130a.12 UN SDGs 12 (12.2), 13 (13.1), 7 (7.2), 7 (7.3), 8 (8.4)</i>	
Upstream and Downstream Energy Consumption	
Report total significant energy consumption in the entity's upstream and downstream value chain (in joules) (GRI 103-3-a)	0.000
List the upstream and downstream categories in which significant energy consumption occurs (GRI 103-3-a)	Not applicable
Report standards, methodologies, assumptions, and calculation tools used, including the source of the conversion factors used (GRI 103-3-b)	Not applicable
<i>Affiliations: ESRS ESRS 1-11 and MDR-M GRI 302-2-b, c SASB EM-MM-110a.1 EM-MM-130a.1 EM-MM-130a.1.1 EM-MM-130a.1.2 EM-MM-130a.1.3 UN SDGs 12 (12.2), 13 (13.1), 7 (7.2), 7 (7.3), 8 (8.4)</i>	

Energy Consumption Outside the Organization

Report the energy consumption outside of the organization (gigajoules, GJ) (GRI 302-2-a)	0.000
<i>Affiliations: ESRS ESRS 1-11 and MDR-M GRI 14.1.2 IPIECA C1 CCE-6 SASB EM-MM-110a.1 EM-MM-130a.1 EM-MM-130a.1.1 EM-MM-130a.1.2 EM-MM-130a.1.3 UN SDGs 12 (12.2), 7 (7.2), 7 (7.3), 8 (8.4)</i>	
Non-renewable energy consumption outside of the organization (gigajoules, GJ)	0.000
Renewable energy consumption outside of the organization (gigajoules, GJ)	0.000
Report the standards, methodologies, assumptions, and/or calculation tools used (GRI 302-2-b)	Not applicable
<i>Affiliations: ESRS ESRS 1-11 and MDR-M GRI 103-3-b, 14.1.3 SASB EM-MM-110a.1 EM-MM-130a.1 EM-MM-130a.1.1 EM-MM-130a.1.2 EM-MM-130a.1.3 UN SDGs 12 (12.2), 13 (13.1), 7 (7.2), 7 (7.3), 8 (8.4)</i>	
Report the source of the conversion factors used (GRI 302-2-c)	Not applicable
<i>Affiliations: ESRS ESRS 1-11 and MDR-M GRI 103-3-b, 14.1.3 SASB EM-MM-110a.1 EM-MM-130a.1 EM-MM-130a.1.1 EM-MM-130a.1.2 EM-MM-130a.1.3 UN SDGs 12 (12.2), 13 (13.1), 7 (7.2), 7 (7.3), 8 (8.4)</i>	

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) (SASB EM-MM-130a.1.1)	46,443.600
<i>Affiliations: GRI 302-1 IFRS-S2 EM-MM-130a.1.1, S2.32 IPIECA C1 CCE-6 SASB TC-SI-130a.1.1 UN SDGs 12 (12.1), 12 (12.2), 6 (6.4), 6(6.5), 7 (7.2), 7 (7.3), 8 (8.4), 9 (9.2), 9 (9.4)</i>	
Percentage energy consumed that was supplied by grid electricity (SASB EM-MM-130a.1.2)	50.4252%
<i>Affiliations: GRI 302-1 IFRS-S2 EM-MM-130a.1.2, S2.32 SASB FB-AG-130a.1.2, TC-SI-130a.1.2 UN SDGs 12 (12.1), 12 (12.2), 6 (6.4), 6(6.5), 7 (7.2), 7 (7.3), 8 (8.4), 9 (9.2), 9 (9.4)</i>	
Percentage of energy consumed that was renewable energy (does not include purchased grid-mix) (SASB EM-MM-130a.1.3)	0.0000%
<i>Affiliations: GRI 302-1 IFRS-S2 EM-MM-130a.1.3, S2.32 SASB FB-AG-130a.1.3, TC-SI-130a.1.2 UN SDGs 12 (12.1), 12 (12.2), 6 (6.4), 6(6.5), 7 (7.2), 7 (7.3), 8 (8.4), 9 (9.2), 9 (9.4)</i>	

Energy

Energy Intensity

The organization-specific metric used in calculations (denominator) (GRI 103-4-a)	0.000
<i>Affiliations: ESRS E1-5-40 to 42 GRI 14.1.4, 302-3-a IPIECA A2 CCE-6</i>	
Type of organization-specific metric	0
Types of energy consumption included in the energy intensity ratio(s) (GRI 103-4-c)	<ul style="list-style-type: none"> Fuel Electricity
<i>Affiliations: ESRS E1-5-40 to 42 GRI 14.1.4, 302-1, 302-3-d IPIECA A2 CCE-6 SASB EM-MM-130a.1 UN SDGs 12 (12.2), 13 (13.1), 7 (7.3), 8 (8.4)</i>	

Reduction in Energy Consumption

Report the reduction in energy consumption achieved (in joules) (GRI 103-5-a)	16,796,419,001,679.645
<i>Affiliations: ESRS ESRS 1-11 and MDR-M GRI 302-4-a SASB EM-MM-130a.1 UN SDGs 12 (12.2), 13 (13.1), 7 (7.3), 8 (8.4)</i>	
	In 2023, electricity was 40,216.187GJ. In 2025, electricity was 23,419.768 GJ. Difference is 16,796,419,001,679 joules.
Are the reductions from the organization's conservation and efficiency initiatives (GRI 103-5-a-i)	No
Are the reductions from other factors (GRI 103-5-a-ii)	Yes
Report the types of energy consumption included in the reduction (GRI 103-5-b)	<ul style="list-style-type: none"> Fuel Electricity
<i>Affiliations: GRI 302-4-a SASB EM-MM-130a.1</i>	
Reduction in energy consumption - fuel (in joules)	0.000
Reduction in energy consumption - electricity (in joules)	16,796,419,001,679.645
Reduction in energy consumption - heating (in joules)	0.000
Reduction in energy consumption - cooling (in joules)	0.000
Reduction in energy consumption - steam (in joules)	0.000

Was the reduction in energy consumption achieved within the organization, in its upstream and downstream value chain, or both (GRI 103-5-c)	Energy consumption reduction was within the organization
If relevant, list the upstream and downstream categories in which reduction was achieved	Not Applicable
Report whether the reduction in energy consumption is estimated, modeled, or sourced from direct measurements and, if applicable, the estimations or modeling methods used (GRI 103-5-d) <i>Affiliations: GRI 302-4-2.7.2 SASB EM-MM-130a.1</i>	Sourced from direct measurements.
Report the base year or baseline for calculating the reduction in energy consumption, including: (GRI 103-5-e) <i>Affiliations: GRI 302-4-c SASB EM-MM-130a.1</i>	2023
The rationale for choosing it	Hycroft has not established formal energy consumption reduction targets or baselines at this time. As an exploration company transitioning toward construction and operations, the company currently employs a measure and monitor approach to track energy consumption.
Energy consumption in the base year or baseline (in joules)	40,216,187,004,021.620
Report standards, methodologies, assumptions, and calculation tools used (GRI 103-5-f) <i>Affiliations: GRI 302-4-d SASB EM-MM-130a.1</i>	Hycroft Mining Holding Corporation reports in accordance with the Global Reporting Initiative Standards and has aligned its sustainability reporting with GRI Standards, SASB, ICMM supplements, and CDP guidelines.

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) (ICMM Guide to Water Reporting 2.2.3a)	3.000
Reused and/or recycled water as a percentage of total water consumed during the reporting period (%) (ONYEN)	Does Not Apply
Provide details about plans to increase water reused and/or recycled, if current reuse and/or recycle rates is considered low (ONYEN)	Hycroft will continue to use the base line year of 2023. Plans to increase recycled water are based on water quality and chemical characteristics. Hycroft will continue to measure and monitor these characteristics and seek to alternate application whenever possible.

Water Management

Disclose the amount of water that was withdrawn from all sources (in thousands of cubic meters) (SASB RR-BI-140a.1.1) <i>Affiliations: Bloomberg TOTAL_WATER_WITHDRAWAL IFRS-S2 RR-BI-140a.1.1, S2.32 IPIECA A4 ENV-1 SASB FB-AG-140a.1.1, IF-EU-140a.1, TC-SI-130a.2 UN SDGs 12 (12.1), 12 (12.2), 12 (12.4), 12 (12.5), 14 (14.1), 3 (3.9), 6 (6.3), 6 (6.4), 6 (6.5), 6 (6.6), 8 (8.4), 9 (9.2), 9 (9.4)</i>	3,000.000
Surface water - including water from wetlands, rivers, lakes, and oceans - (in thousands of cubic meters)	0.000
Ground water (in thousands of cubic meters)	3,000.000
Rain water collected directly and stored by the company (in thousands of cubic meters)	0.000
Waste water obtained from other entities (in thousands of cubic meters)	0.000
Municipal water supplies (in thousands of cubic meters)	0.000
Other water utilities (in thousands of cubic meters)	0.000
Other, please specify (in thousands of cubic meters)	0.000
Disclose the amount of water that was withdrawn from non-freshwater sources (in thousands of cubic meters) (SASB RR-BI-140a.1.2) <i>Affiliations: IFRS-S2 RR-BI-140a.1.2, S2.32 IPIECA A4 ENV-1 SASB FB-AG-140a.1.1, IF-EU-140a.9, TC-SI-130a.2 UN SDGs 12 (12.1), 12 (12.2), 12 (12.4), 12 (12.5), 14 (14.1), 3 (3.9), 6 (6.3), 6 (6.4), 6 (6.5), 6 (6.6), 8 (8.4), 9 (9.2), 9 (9.4)</i>	0.000
Disclose the amount of water that was withdrawn from fresh water sources (in thousands of cubic meters) (SASB EM-MM-140a.1.1) <i>Affiliations: CDP W1 C2.3 C-FS2.2d CDSB REQ-04 GRI 303-3-a ICMM Guide to Water Reporting 2.2.3a IFRS-S2 EM-EP-140a.1.1, EM-MM-140a.1.1, EM-RM-140a.1, RR-BI-140a.1.2, S2.32 IPIECA C1 ENV-1 SASB EM-EP-140a.1.1, EM-RM-140a.1, FB-AG-140a.1.1, IF-EU-140a.1, RR-BI-140a.1.2, TC-SI-</i>	3,000.000

130a.2 UN SDGs 12 (12.1), 12 (12.2), 12 (12.4), 12 (12.5), 14 (14.1), 3 (3.9), 6 (6.3), 6 (6.4), 6 (6.5), 6 (6.6), 8 (8.4), 9 (9.2), 9 (9.4) Disclose the amount of fresh water that was consumed in its operations (in thousands of cubic meters) (SASB EM-MM-140a.1.2)	3,000.000
Affiliations: CDP W1 C2.3 C-FS2.2d CDSB REQ-04 GRI 303-3, 303-4, 303-6 ICMM Guide to Water Reporting 2.2.3a IFRS-S2 EM-EP-140a.1.1, EM-MM-140a.1.2, EM-RM-140a.1, RR-BI-140a.1.2, S2.32 IPIECA C2 ENV-2 SASB EM-EP-140a.1.1, EM-RM-140a.1, FB-AG-140a.1.3, IF-EU-140a.1, RR-BI-140a.1.2 UN SDGs 12 (12.1), 12 (12.2), 12 (12.4), 12 (12.5), 14 (14.1), 3 (3.9), 6 (6.3), 6 (6.4), 6 (6.5), 6 (6.6), 8 (8.4), 9 (9.2), 9 (9.4)	
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 (SASB EM-MM-140a.1.3)	Ground water is extracted from local on-site wells in accordance with active permits. None of these well sites are located within High or Extremely High Baseline Water Stress locations.
Affiliations: CDP W1 C2.3 C-FS2.2d CDSB REQ-04 GRI 303-3 ICMM Guide to Water Reporting 2.2.3a IFRS-S2 EM-EP-140a.1.1, EM-MM-140a.1.3, EM-RM-140a.1, RR-BI-140a.1.2, S2.32, TC-SI-130a.2.5 IPIECA C3 ENV-1 SASB EM-EP-140a.1.1, EM-RM-140a.1, FB-AG-140a.1.4, IF-EU-140a.1, RR-BI-140a.1.2, TC-SI-130a.2.4 UN SDGs 12 (12.1), 12 (12.2), 12 (12.4), 12 (12.5), 14 (14.1), 3 (3.9), 6 (6.3), 6 (6.4), 6 (6.5), 6 (6.6), 8 (8.4), 9 (9.2), 9 (9.4) WEF-MSA Pillar 2: Planet - Freshwater Availability - Water consumption and withdrawal in water-stressed areas	
Disclose the fresh water withdrawn in locations with high or extremely high baseline water stress as a percentage of the total water withdrawn (SASB EM-MM-140a.1.4)	0.0000%
Affiliations: CDP W1 C2.3 C-FS2.2d CDSB REQ-04 GRI 303-3 ICMM Guide to Water Reporting 2.2.3a IFRS-S2 EM-EP-140a.1.1, EM-MM-140a.1.4, EM-RM-140a.1, RR-BI-140a.1.2, S2.32, TC-SI-130a.2.5 IPIECA C4 ENV-1 SASB EM-EP-140a.1.1, EM-RM-140a.1, FB-AG-140a.1.5, IF-EU-140a.1, RR-BI-140a.1.2, TC-SI-130a.2.5 UN SDGs 12 (12.1), 12 (12.2), 12 (12.4), 12 (12.5), 14 (14.1), 3 (3.9), 6 (6.3), 6 (6.4), 6 (6.5), 6 (6.6), 8 (8.4), 9 (9.2), 9 (9.4) WEF-MSA Pillar 2: Planet - Freshwater Availability - Water consumption and withdrawal in water-stressed areas	
Disclose water withdrawn in locations with high or extremely high baseline water stress (in thousands of cubic meters)	0.000
Disclose fresh water consumed in locations with high or extremely high baseline water stress as a percentage of the total water consumed (SASB EM-MM-140a.1.5)	0.0000%
Affiliations: CDP W1 C2.3 C-FS2.2d CDSB REQ-04 GRI 303-3, 303-4, 303-5 ICMM Guide to Water Reporting 2.2.3a IFRS-S2 EM-EP-140a.1.1, EM-MM-140a.1.5, EM-RM-140a.1, RR-BI-140a.1.2, S2.32, TC-SI-130a.2.6 IPIECA C3 ENV-1 SASB EM-EP-140a.1.1, EM-RM-140a.1, FB-AG-140a.1.6, IF-EU-140a.1, RR-BI-140a.1.2, TC-SI-130a.2.6 UN SDGs 12 (12.1), 12 (12.2), 12 (12.4), 12 (12.5), 14 (14.1), 3 (3.9), 6 (6.3), 6 (6.4), 6 (6.5), 6 (6.6), 8 (8.4), 9 (9.2), 9 (9.4) WEF-MSA Pillar 2: Planet - Freshwater Availability - Water consumption and withdrawal in water-stressed areas	
Total water consumed in locations with high or extremely high baseline water stress (in thousands of cubic meters)	0.000
Was your organization subject to any fines, enforcement orders, and/or other penalties for water-related regulatory violations (SASB RR-BI-140a.3)	No
Affiliations: Bloomberg NUM_ENVIRON_FINES CDP C-FS2.2d, C2.3, W1, W2.2 CDSB REQ-04 GRI 303-5 ICMM Guide to Water Reporting 2.2.3a IFRS-S2 EM-MM-140a.1, S2.32 SASB EM-MM-140a.1, FB-AG-140a.3, IF-EU-140a.2	
Total number of incidents of non-compliance associated with water quality permits, standards, and regulations, including violations of a technology-based standard and exceedances of quality-based standards (note: only those that resulted in a formal enforcement action(s)) (SASB EM-MM-140a.2.1)	0
Affiliations: CDP W1 C2.3 C-FS2.2d CDSB REQ-04 GRI 303-5 ICMM Guide to Water Reporting 2.2.3a IFRS-S2 EM-MM-140a.2.1, RR-BI-140a.3.1, S2.32 SASB FB-AG-140a.3.4, IF-EU-140a.2, RR-BI-140a.3.1 UN SDGs 12 (12.1), 12 (12.2), 12 (12.4), 12 (12.5), 14 (14.1), 3 (3.9), 6 (6.3), 6 (6.4), 6 (6.5), 6 (6.6), 8 (8.4), 9 (9.2), 9 (9.4)	
Water and Effluents	
Water Withdrawal by Segment	
Total water withdrawn by segment, in megalitres (ML) (GRI 303-3-a)	3.000
Affiliations: CDP W1 C2.3 C-FS2.2d CDSB REQ-04 GRI 14.7.4 ICMM Guide to Water Reporting 2.2.3a IPIECA C1 ENV-1 SASB EM-MM-140a.1, IF-EU-140a.1 UN SDGs 6 (6.4)	
Surface water (total in ML) (GRI 303-3-a-i)	0.000
Affiliations: GRI 14.7.4 UN SDGs 6 (6.4)	
Groundwater (total in ML) (GRI 303-3-a-ii)	3.000
Affiliations: GRI 14.7.4 UN SDGs 6 (6.4)	
Freshwater (≤1,000 mg/L Total Dissolved Solids or TDS)	3.000
Other water (>1,000 mg/L Total Dissolved Solids or TDS)	0.000
Seawater (total in ML) (GRI 303-3-a-iii)	0.000
Affiliations: GRI 14.7.4 UN SDGs 6 (6.4)	

Produced water (total in ML) (GRI 303-3-a-iv)	0.000
<i>Affiliations: GRI 14.7.4 UN SDGs 6 (6.4)</i>	
Third-party water (total in ML) (GRI 303-3-a-v)	0.000
<i>Affiliations: ESRS ESRS 1-11 and MDR-M GRI 14.7.4 UN SDGs 6 (6.4)</i>	
Report on the total water withdrawal from all areas with water stress in megalitres (ML), and a breakdown of this total by the following sources (GRI 303-3-b)	0.000
<i>Affiliations: CDP W1 C2.3 C-FS2.2d CDSB REQ-04 ESRS ESRS 1-11 and MDR-M GRI 13.7.5, 14.7.4 ICMM Guide to Water Reporting 2.2.3a IPIECA C4 ENV-1 SASB EM-MM-140a.1 UN SDGs 6 (6.4) WEF-MS C Pillar 2: Planet - Freshwater Availability - Water consumption and withdrawal in water-stressed areas</i>	
Surface water (total in ML) (GRI 303-3-b-i)	0.000
<i>Affiliations: ESRS ESRS 1-11 and MDR-M GRI 13.7.5, 14.7.4</i>	
Groundwater (total in ML) (GRI 303-3-b-ii)	0.000
<i>Affiliations: ESRS ESRS 1-11 and MDR-M GRI 13.7.5, 14.7.4 UN SDGs 6 (6.4)</i>	
Seawater (total in ML) (GRI 303-3-b-iii)	0.000
<i>Affiliations: ESRS ESRS 1-11 and MDR-M GRI 13.7.5, 14.7.4 UN SDGs 6 (6.4)</i>	
Produced water (total in ML) (GRI 303-3-b-iv)	0.000
<i>Affiliations: ESRS ESRS 1-11 and MDR-M GRI 13.7.5, 14.7.4 UN SDGs 6 (6.4)</i>	
Third-party water, in megalitres (ML), and a breakdown of this total by the withdrawal sources (GRI 303-3-b-v)	0.000
<i>Affiliations: ESRS ESRS 1-11 and MDR-M GRI 13.7.5, 14.7.4 UN SDGs 6 (6.4)</i>	
Report any contextual information necessary to understand how the data was compiled, i.e., any standards, methodologies, and assumptions used (GRI 303-3-d)	Hycroft Mining's water data compilation follows rigorous quality assurance and quality control protocols established across its operations. The company utilizes standardized measurement methodologies consistent with industry best practices and regulatory requirements applicable to its Nevada operations. Data verification processes include interval-by-interval validation against source documentation and spot-check confirmation by qualified personnel to ensure accuracy and reliability. All measurements are recorded in imperial units unless otherwise stated, with comprehensive documentation maintained throughout the collection and analysis process. The reporting encompasses sustainability matters related to the Hycroft Mine located in Nevada, United States, covering the calendar year 2025. Water management data is compiled in accordance with GRI Standards and aligned with frameworks including the International Council on Mining and Metals guidelines and Sustainability Accounting Standards Board requirements applicable to mining operations.
<i>Affiliations: ESRS ESRS 1-11 and MDR-M GRI 13.7.5, 14.7.4 UN SDGs 6 (6.4)</i>	

Water Consumption

Report the total water consumption from all areas in megalitres (GRI 303-5-a)	3,000,000
<i>Affiliations: Bloomberg TOTAL_WATER_USE CDP W1 C2.3 C-FS2.2d CDSB REQ-04 ESRS ESRS E3-4-28 (a), (b), (d) and (e) GRI 13.7.6, 14.7.6 ICMM Guide to Water Reporting 2.2.3a IPIECA C2 ENV-1 SASB EM-MM-140a.1 UN SDGs 6 (6.4)</i>	
Report the total water consumption from all areas with water stress in megalitres (GRI 303-5-b)	0.000
<i>Affiliations: CDP W1 C2.3 C-FS2.2d CDSB REQ-04 ESRS ESRS E3-4-28 (a), (b), (d) and (e) GRI 13.7.6, 14.7.6 ICMM Guide to Water Reporting 2.2.3a IPIECA C2 ENV-1, C3 ENV-1 SASB EM-MM-140a.1 UN SDGs 6 (6.4) WEF-MS C Pillar 2: Planet - Freshwater Availability - Water consumption and withdrawal in water-stressed areas</i>	

Biodiversity

Management Plan

What is the biodiversity management plan implementation stage (ONYEN)

Hycroft has approved environmental and biodiversity management plans that are current and will remain in effect through mine life and during site reclamation. Under the Environmental Impact Statement approved by the U.S. Bureau of Land Management in October 2019, the project alternatives will have no impact on threatened or endangered

listed species and will result in fewer acres of habitat loss. Annual monitoring, mitigation, and adaptive management procedures are actively conducted to reduce impacts on wildlife including avian species, with coordination occurring with regulatory authorities including the Nevada Department of Wildlife and U.S. Fish and Wildlife Service as necessary. The company conducts nest surveys within potential breeding habitat prior to surface disturbance during avian breeding season, installs fences and netting to prevent access by wildlife, monitors for noxious weeds in accordance with established plans, and will reclaim disturbed lands to promote reestablishment of native plant and wildlife habitats following construction activities.

Waste Management

Tailings Storage Facilities Management

Does your company manage Tailings Storage Facilities (ONYEN)

No

Disclose the approach to the development of Emergency Preparedness and Response Plans (EPRPs) (SASB EM-MM-540a.3.1)

Hycroft does not currently have or operate a Tailings Storage Facility.

Affiliations: UN SDGs 14 (14.1), 3 (3.9), 6 (6.3)

Innovation

Spending on Research, Development, and Technologies for waste management compliance and improvement (currency, Thousands) (ONYEN)

0

Affiliations: IPIECA C3 ENV-7

Describe nature of spending on Research, Development and Technologies for waste management compliance and improvement (ONYEN)

Not applicable at this time.

Affiliations: IPIECA C3 ENV-7

Critical Incident Management

Response Preparedness

Describe the organization's approach to emergency preparedness and response plans (GRI 14.15.1)

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



Emergency Response Plan

Frequency of testing the plans

Semi-annually

How engagement with local communities, workers, public sector agencies, first responders, and local authorities and institutions has informed the plans

Emergency Plan has been shared with local first responder authorities. Members of the Hycroft Security team are also members of the local emergency institutions.

Report the number of critical incidents in the reporting period (GRI 14.15.3)

0

Describe the impacts from the incidents (GRI 14.15.3)

Not applicable.

Actions taken to remediate the negative impacts from the incidents (GRI 14.15.3)

Not applicable.

Report the percentage of mine sites that have emergency preparedness and response plans in place (%) (GRI 14.15.4)

100.0000%

List the sites that do not have emergency preparedness and response plans (GRI 14.15.4)

Hycroft has one site and it is covered by the Emergency Response Plan.

Biodiversity

Management Plan

Describe the environmental and biodiversity management plan(s) implemented at active sites (SASB EM-MM-160a.1)

Approved Environmental Plan received October 2019.

Affiliations: IPIECA C1 ENV-3 | SASB EM-EP-160a.1.1 | UN SDGs 11 (11.4), 12 (12.1), 12 (12.2), 12 (12.4), 12 (12.5), 14 (14.1), 14 (14.2), 14 (14.3), 15 (15.3), 15 (15.4), 15 (15.5), 15 (15.9), 15 (15.a), 6 (6.3), 8 (8.4), 9 (9.2), 9 (9.4)



EIS Monitoring Plan



Golden Eagle Monitoring Plan

Lifecycle stages to which the plan(s) apply	<ul style="list-style-type: none"> • Exploration and appraisal • Site development
The topics addressed by the plan(s)	<ul style="list-style-type: none"> • Ecological and biodiversity impacts • Waste generation • Noise impacts • Emissions to air • Discharges to water • Natural resource consumption • Hazardous chemical usage
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 (US Bureau of Land Management).

Impacts of Policies and Procedures

Where relevant, describe specific policies and practices that apply to areas with protected conservation status and/or areas of critical habitat, which are defined by the International Finance Corporation (IFC) Performance Standard 6 (SASB EM-MM-160a.1.2)

Affiliations: IPIECA C1 ENV-3 | SASB EM-EP-160a.1.5 | UN SDGs 11 (11.4), 12 (12.1), 12 (12.2), 12 (12.4), 12 (12.5), 14 (14.1), 14 (14.2), 14 (14.3), 15 (15.3), 15 (15.4), 15 (15.5), 15 (15.9), 15 (15.a), 6 (6.3), 8 (8.4), 9 (9.2), 9 (9.4)

There are no areas with "protected conservation status or areas of critical habitat" within the mine permitted boundaries.

If the management policies and practices do not apply to all of the entity's sites or operations, indicate the percentage of sites to which they were applied (SASB EM-MM-160a.1.3)

Affiliations: IPIECA C1 ENV-3 | SASB EM-EP-160a.1.6 | UN SDGs 11 (11.4), 12 (12.1), 12 (12.2), 12 (12.4), 12 (12.5), 14 (14.1), 14 (14.2), 14 (14.3), 15 (15.3), 15 (15.4), 15 (15.5), 15 (15.9), 15 (15.a), 6 (6.3), 8 (8.4), 9 (9.2), 9 (9.4)

100.0000%

Where environmental management policies and practices differ significantly by mineral resource (e.g., bauxite mining as compared to silver mining) then describe differences for each resource (SASB EM-MM-160a.1.4)

Affiliations: IPIECA C1 ENV-3 | SASB EM-EP-160a.1.6 | UN SDGs 11 (11.4), 12 (12.1), 12 (12.2), 12 (12.4), 12 (12.5), 14 (14.1), 14 (14.2), 14 (14.3), 15 (15.3), 15 (15.4), 15 (15.5), 15 (15.9), 15 (15.a), 6 (6.3), 8 (8.4), 9 (9.2), 9 (9.4)

Environmental management policies, practices, and procedures are in compliance with regulatory standards for a gold and silver mine and extraction processes. The Company's environmental management approach applies consistently across both gold and silver mineral resources, with integrated policies addressing ecological and biodiversity impacts, waste generation, noise and air emissions, water discharges, natural resource consumption, and hazardous chemical usage. No material differences exist in the application of environmental management practices between the gold and silver resources at the Hycroft Mine, as both are processed through the same operational framework under a single Environmental Impact Statement approved by the U.S. Bureau of Land Management.

Policies to halt and reverse biodiversity loss

Describe the entity's policies or commitments to halt and reverse biodiversity loss, and how these are informed by the 2050 Goals and 2030 Targets in the Kunming-Montreal Global Biodiversity Framework (GRI 101-1-a)

Affiliations: GRI 14.4.2

Hycroft has not established specific policies or commitments aligned with the Kunming-Montreal Global Biodiversity Framework or its 2030 Targets and 2050 Goals. The company's biodiversity management approach is guided by the Environmental Impact Statement approved by the U.S. Bureau of Land Management, which ensures that project alternatives will have no impact on threatened or endangered species.

Report the extent to which these policies or commitments apply to the organization's activities and to its business relationships (GRI 101-1-b)

Affiliations: GRI 14.4.2

The company's biodiversity management approach is guided by the Environmental Impact Statement approved by the U.S. Bureau of Land Management, which ensures that project alternatives will have no impact on threatened or endangered species.

Report the goals and targets to halt and reverse biodiversity loss, whether they are informed by scientific consensus, the base year, and the indicators used to evaluate progress (GRI 101-1-c)

Affiliations: GRI 14.4.2

Goals and targets have not been established.

Management of biodiversity impacts

Describe actions taken to avoid negative impacts on biodiversity (GRI 101-2-a-i)

The company's biodiversity management approach is guided by the Environmental

Affiliations: GRI 14.4.3	Impact Statement approved by the U.S. Bureau of Land Management, which ensures that project alternatives will have no impact on threatened or endangered species.
Describe actions taken to minimize negative impacts on biodiversity that were not avoided (GRI 101-2-a-ii)	Hycroft has successfully avoided biodiversity areas that may have threatened or endangered species.
Affiliations: GRI 14.4.3	
Describe actions taken to restore and rehabilitate affected ecosystems, including the goals of the restoration and rehabilitation, and how stakeholders are engaged throughout the restoration and rehabilitation actions (GRI 101-2-a-iii)	Hycroft has successfully avoided biodiversity areas that may have threatened or endangered species, therefore there have been no actions required to restore or rehabilitate any affected ecosystems.
Affiliations: GRI 14.4.3	
Site 1	
Report the size of the area under restoration or rehabilitation (in hectares) (GRI 101-2-b-ii)	0.000
Affiliations: GRI 14.4.3	
Report the size of the area already restored or rehabilitated (in hectares) (GRI 101-2-b-ii)	0.000
Affiliations: GRI 14.4.3	
Describe actions taken to offset residual negative impacts on biodiversity (GRI 101-2-a-iv)	Hycroft has successfully avoided biodiversity areas that may have threatened or endangered species, therefore there have been no actions required to offset residual negative impacts.
Affiliations: GRI 14.4.3	
Offset 1	
Offset goals (GRI 101-2-c-i)	Hycroft Mining has implemented a comprehensive biodiversity management approach centered on avoidance. The Environmental Impact Statement approved by the U.S. Bureau of Land Management confirms that project alternatives will have no impact on threatened or endangered species. Through strategic site planning, the company has successfully avoided biodiversity areas containing threatened or endangered species, eliminating the need for restoration, rehabilitation, or offset actions.
Affiliations: GRI 14.4.3	
Describe transformative actions taken and additional conservation actions taken (GRI 101-2-a-v)	Hycroft has successfully avoided biodiversity areas that may have threatened or endangered species, therefore there have been no additional actions required to offset residual negative impacts.
Affiliations: GRI 14.4.3	
List which of its sites with the most significant impacts on biodiversity have a biodiversity management plan and explain why the other sites do not have a management plan (GRI 101-2-d)	Hycroft has no sites that require specific biodiversity management plans.
Affiliations: GRI 14.4.3	
Describe how the entity enhances synergies and reduces trade-offs between actions taken to manage its biodiversity and climate change impacts (GRI 101-2-e)	Hycroft has no sites that require specific biodiversity management plans, therefore there are no actions required to enhance synergies or climate-change impacts.
Affiliations: GRI 14.4.3	
Describe how it ensures that the actions taken to manage its impacts on biodiversity avoid and minimize negative impacts and maximize positive impacts for stakeholders (GRI 101-2-f)	Hycroft has identified specific monitoring positions around the mine site to assure that threatened or endangered species, sensitive ecosystems, or habitat conditions are adequately avoided and protected.
Affiliations: GRI 14.4.3	
Access and benefit-sharing	
Describe the process to ensure compliance with access and benefit-sharing regulations and measures (GRI 101-3-a)	Hycroft Mining has not yet disclosed a specific process for ensuring compliance with access and benefit-sharing regulations and measures. The company's sustainability disclosures focus primarily on environmental management, occupational health and safety, human rights, and governance practices, but do not currently address access and benefit-sharing frameworks that may apply to genetic resources and traditional knowledge associated with mining operations.
Describe voluntary actions taken to advance access and benefit-sharing that are additional to legal obligations or when there are no regulations and measures (GRI 101-3-b)	Hycroft Mining has not undertaken voluntary actions beyond legal obligations related to access and benefit-sharing.
Identification of biodiversity impacts	
Explain how the entity has determined which of its sites and which products and services in its supply chain have the most significant actual and potential impacts on biodiversity (GRI 101-4-a)	Hycroft Mining has determined its biodiversity impacts through a comprehensive

Affiliations: GRI 14.4.4

environmental assessment process aligned with regulatory requirements.

Locations with biodiversity impacts

Report the location and size in hectares of the entity's sites with the most significant impacts on biodiversity (GRI 101-5-a)

Hycroft encompasses approximately 64,000 acres, which converts to approximately 25,900 hectares. The site is located in an area with biodiversity considerations, and Hycroft implements protective measures including nest surveys within potential avian breeding habitats prior to surface disturbance, installation of fencing and netting to prevent wildlife access, noxious weed monitoring and control, and reclamation efforts to promote reestablishment of native plant and wildlife habitats on areas of disturbed land no longer required for operations.

Affiliations: GRI 14.4.5

Site 1

Site name (GRI 101-5-b)

Hycroft Mine

Affiliations: GRI 14.4.5

Is the site in or near an ecologically sensitive area (GRI 101-5-b)

No

Affiliations: GRI 14.4.5

If applicable, what is the distance to this area (km)

0.000

Is the area of biodiversity importance (GRI 101-5-b-i)

No

Affiliations: GRI 14.4.5

Is the area of high ecosystem integrity (GRI 101-5-b-ii)

No

Affiliations: GRI 14.4.5

Is the area of rapid decline in ecosystem integrity (GRI 101-5-b-iii)

No

Affiliations: GRI 14.4.5

Is the area of high physical water risks (GRI 101-5-b-iv)

No

Affiliations: GRI 14.4.5

Is the area important for the delivery of ecosystem service benefits to Indigenous Peoples, local communities, and other stakeholders (GRI 101-5-b-v)

No

Affiliations: GRI 14.4.5

Report the activities that take place at the site (GRI 101-5-c)

Not Applicable

Affiliations: GRI 14.4.5

Report the products and services in its supply chain with the most significant impacts on biodiversity (GRI 101-5-d)

Hycroft's supply chain comprises heavy equipment repair and service parts, maintenance and operational goods, bulk reagents and chemicals, and fuel supplies sourced directly from suppliers in the United States of America, specifically in the State of Nevada.

Affiliations: GRI 14.4.5

Report the countries or jurisdictions where the activities associated with these products and services take place

Hycroft's supply chain comprises heavy equipment repair and service parts, maintenance and operational goods, bulk reagents and chemicals, and fuel supplies sourced directly from suppliers in the United States of America, specifically in the State of Nevada.

Direct drivers of biodiversity loss

For the sites with the most significant impacts on biodiversity, do corporate activities lead or could lead to land and sea use change (GRI 101-6-a)

No

Affiliations: GRI 14.4.6

For the sites with the most significant impacts on biodiversity, do corporate activities lead or could lead to the exploitation of natural resources (GRI 101-6-b)

No

Affiliations: GRI 14.4.6

For the sites with the most significant impacts on biodiversity, do corporate activities lead or could lead to pollution (GRI 101-6-c)

No

Affiliations: GRI 14.4.6

For the sites with the most significant impacts on biodiversity, do corporate activities lead or could lead to the introduction of invasive alien species (GRI 101-6-d) <i>Affiliations: GRI 14.4.6</i>	No
For each product and service in the entity's supply chain with the most significant impacts on biodiversity, will you be providing detailed information on impacts (GRI 101-6-e) <i>Affiliations: GRI 14.4.6</i>	No
Report contextual information necessary to understand how the data has been compiled, including standards, methodologies, and assumptions used (GRI 101-6-f) <i>Affiliations: GRI 14.4.6</i>	Hycroft Mining Holding Corporation compiled this report in accordance with the Global Reporting Initiative Standards and the GRI Mining and Metals Supplement. Data collection follows procedures established by the International Council on Mining and Metals and the Sustainability Accounting Standards Board guidelines.
Changes to the state of biodiversity	
For the sites with the most significant impacts on biodiversity, are there any affected or potentially affected ecosystems (GRI 101-7) <i>Affiliations: GRI 14.4.7</i>	No
Report contextual information necessary to understand how the data has been compiled, including standards, methodologies, and assumptions used (GRI 101-7-b) <i>Affiliations: GRI 14.4.7</i>	Hycroft's data compilation follows established methodologies aligned with GRI Standards, IFRS Sustainability Disclosure Standards, and industry-specific guidance including the Global Reporting Initiative Mining and Metals Supplement and International Council on Mining and Metals standards.
Ecosystem services	
For the sites with the most significant impacts on biodiversity, have you defined ecosystem services and beneficiaries affected or potentially affected by the organization's activities (GRI 101-8-a) <i>Affiliations: GRI 14.4.8</i>	No Hycroft has one site and biodiversity ecosystems exist around the site. These specific areas are identified and monitored by the Environmental Department.
Impacts	
Percentage of sites in or near ecologically sensitive areas (GRI 101-5-b)	0.0000%
Does access to the site involve traversing a protected area (ONYEN) <i>Affiliations: CDP W8 SASB EM-MM-160a.3</i>	No
Do any of the entities concessions share a watershed with a protected area (ONYEN) <i>Affiliations: CDP W8 SASB EM-MM-160a.3</i>	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 (ONYEN) <i>Affiliations: CDP W8 SASB EM-MM-160a.3</i>	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 proven reserves in sites with protected conservation status or in areas of endangered species habitat (SASB EM-MM-160a.3.1)	Does Not Apply
<i>Affiliations: GRI 304-1,304-2, 304-3 SASB EM-EP-160a.3.1 UN SDGs 11 (11.4), 12 (12.1), 12 (12.2), 12 (12.4), 12 (12.5), 14 (14.1), 14 (14.2), 14 (14.3), 15 (15.3), 15 (15.4), 15 (15.5), 15 (15.9), 15 (15.a), 6 (6.3), 8 (8.4), 9 (9.2), 9 (9.4) WEF-MSC Pillar 2: Planet - Nature Loss - Land Use and Ecological Sensitivity</i>	
Grade of proven reserves located in areas either with protected conservation status or in areas of endangered species habitat - Metals (SASB EM-MM-160a.3.1)	
<i>Affiliations: GRI 304-1,304-2, 304-3</i>	
Gold (Au) (grams per tonne)	0.000
	Hycroft is a gold and silver mine but has no proven reserves at this time.
Silver (Ag) (grams per tonne)	0.000
	Hycroft is a gold and silver mine but has no proven reserves at this time.
Percentage of probable reserves in sites with protected conservation status or in areas of endangered species habitat (SASB EM-MM-160a.3.2)	Does Not Apply
<i>Affiliations: GRI 304-1,304-2, 304-3 SASB EM-EP-160a.3 UN SDGs 11 (11.4), 12 (12.1), 12 (12.2), 12 (12.4), 12 (12.5), 14 (14.1), 14 (14.2), 14 (14.3), 14 (14.5), 15 (15.3), 15 (15.4), 15 (15.5), 15 (15.9), 15 (15.a), 6 (6.3), 6 (6.6), 8 (8.4), 9 (9.2), 9 (9.4)</i>	
Grade of probable reserves located in areas either with protected conservation status or in areas of endangered species habitat - Metals (SASB EM-MM-160a.3.2)	
<i>Affiliations: GRI 304-1,304-2, 304-3</i>	
Gold (Au) (grams per tonne)	0.000
	Hycroft is a gold and silver mine but has no probable reserves at this time.
Silver (Ag) (grams per tonne)	0.000
	Hycroft is a gold and silver mine but has no probable reserves at this time.

Social

Scale of the Organization

Direct Employee Information

Total number of permanent full-time employees (GRI 2-7-b-iv)	51
<i>Affiliations: ESRS ESRS 2 SBM-1-40 (a) iii, S1-6-50 (a) to (b) and (d) to (e), 51 to 52</i>	
Full-time - Male	34
Full-time - Female	17
Full-time - Other	0
Full-time - Gender not disclosed	0
Total number of permanent part-time employees (GRI 2-7-b-v)	0
<i>Affiliations: Bloomberg NUMBER_OF_PART_TIME_EMPLOYEES ESRS ESRS 2 SBM-1-40 (a) iii, S1-6-50 (a) to (b) and (d) to (e), 51 to 52 WDI Section 3: Workforce Composition - Direct Operations Section 6: Stability - Direct Operations</i>	
Total number of permanent employees (full-time & part-time) (GRI 2-7-b-i)	51
<i>Affiliations: ESRS ESRS 2 SBM-1-40 (a) iii, S1-6-50 (a) to (b) and (d) to (e), 51 to 52</i>	
Permanent employees - Male	34
Permanent employees - Female	17
Permanent employees -Other	0
Permanent employees - Gender not disclosed	0
Total number of temporary employees (full-time & part-time) (GRI 2-7-b-ii)	0
<i>Affiliations: Bloomberg NUMBER_OF_TEMPORARY_EMPLOYEES ESRS ESRS 2 SBM-1-40 (a) iii, S1-6-50 (a) to (b) and (d) to (e), 51 to 52</i>	

Total number of direct employees (includes full-time permanent, part-time permanent, temporary; exclude workers who are not employees) (GRI 2-7-a)	51
<i>Affiliations: Bloomberg NUMBER_EMPLOYEES_CSR ESRS ESRS 2 SBM-1-40 (a) iii AR 12-13, S1-6-50 (a) to (b) and (d) to (e), 51 to 52 GRI 102-8 IFRS-S2 EM-MM-000.B SASB EM-MM-000.B, TC-SI-330a.3 UN SDGs 10 (10.3), 8 (8.5) WDI Section 3: Workforce Composition - Direct Operations Section 6: Stability - Direct Operations WEF-MS-C Pillar 4: Prosperity - Employment and wealth generation - Absolute number and rate of employment</i>	
Direct employees - Male	34
Direct employees - Female	17
Direct employees - Other	0
Direct employees - Gender not disclosed	0
Percentage of direct employees - Male (GRI 2-7-a)	66.6667%
<i>Affiliations: ESRS ESRS 2 SBM-1-40 (a) iii AR 12-13, S1-6-50 (a) to (b) and (d) to (e), 51 to 57 SASB TC-SI-330a.3</i>	
Percentage of direct employees - Female (GRI 2-7-a)	33.3333%
<i>Affiliations: ESRS ESRS 2 SBM-1-40 (a) iii AR 12-13, S1-6-50 (a) to (b) and (d) to (e), 51 to 58 SASB TC-SI-330a.3</i>	
Percentage of direct employees - Other (GRI 2-7-a)	0.0000%
<i>Affiliations: ESRS ESRS 2 SBM-1-40 (a) iii AR 12-13, S1-6-50 (a) to (b) and (d) to (e), 51 to 59 SASB TC-SI-330a.3</i>	
Percentage of direct employees - Gender not disclosed (GRI 2-7-a)	0.0000%
<i>Affiliations: ESRS ESRS 2 SBM-1-40 (a) iii AR 12-13, S1-6-50 (a) to (b) and (d) to (e), 51 to 60 SASB TC-SI-330a.3</i>	
Out of the total direct employees, what is the number of non-guaranteed hours direct employees (GRI 2-7-b-iii)	0
<i>Affiliations: ESRS ESRS 2 SBM-1-40 (a) iii, S1-6-50 (a) to (b) and (d) to (e), 51 to 52 UN SDGs 10 (10.3), 8 (8.5) WDI Section 3: Workforce Composition - Direct Operations Section 6: Stability - Direct Operations</i>	
Describe the methodologies and assumptions used to compile the data (GRI 2-7-c)	Data source is from the position application forms within the Human Resources Department.
<i>Affiliations: ESRS ESRS 2 SBM-1-40 (a) iii, S1-6-50 (a) to (b) and (d) to (e), 51 to 52 WDI Section 3: Workforce Composition - Direct Operations Section 6: Stability - Direct Operations</i>	
	Hycroft uses a Human Resources Information System (HRIS) to maintain employee key critical information.
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	Total number as at the end of the reporting period
Describe significant fluctuations, if any, in the number of direct employees during the reporting period and between reporting periods (GRI 2-7-e)	Fluctuations occurred based on operational demand.
<i>Affiliations: ESRS ESRS 2 SBM-1-40 (a) iii, S1-6-50 (a) to (b) and (d) to (e), 51 to 56 WDI Section 3: Workforce Composition - Direct Operations Section 6: Stability - Direct Operations</i>	
Number of direct employees hired locally (ONYEN)	51
Number of direct employees hired locally as a percentage of total number of direct employees (ONYEN)	100.0000%
Describe how the entity defines "local" (ONYEN)	"Locally" is defined as within 100-mile radius of Winnemucca, Nevada, USA.
Workers Who are Not Employees	
Total number of workers who are not employees - Male (full-time, part-time) (GRI 2-8-a)	11
<i>Affiliations: ESRS S1-7-55 to 56 SASB TC-SI-330a.3</i>	
Full-time - Male	0
Part-time - Male	11
Total number of workers who are not employees - Female (full-time, part-time) (GRI 2-8-a)	2
<i>Affiliations: ESRS S1-7-55 to 56 SASB TC-SI-330a.3</i>	
Full-time - Female	0

	Part-time - Female	2
Total number of workers who are not employees - Other (full-time, part-time) (GRI 2-8-a)		0
<i>Affiliations: ESRS S1-7-55 to 56 SASB TC-SI-330a.3</i>		
	Full-time - Other	0
	Part-time - Other	0
Total number of workers who are not employees - Gender not disclosed (full-time, part-time) (GRI 2-8-a)		0
<i>Affiliations: ESRS S1-7-55 to 56 SASB TC-SI-330a.3</i>		
	Full-time - Gender not disclosed	0
	Part-time - Gender not disclosed	0
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) (GRI 2-8-a)		13
<i>Affiliations: Bloomberg NUMBER_OF_CONTRACTORS ESRS S1-7-55 to 56 GRI 102-8 IFRS-S2 EM-MM-000.B SASB EM-MM-000.B, TC-SI-330a.3 UN SDGs 10 (10.3), 8 (8.5) WDI Section 3: Workforce Composition - Direct Operations Section 6: Stability - Direct Operations WEF-MSc Pillar 4: Prosperity - Employment and wealth generation - Absolute number and rate of employment</i>		
Percentage of workers who are not employees - Male (GRI 2-8-a)		84.6154%
<i>Affiliations: ESRS S1-7-55 to 56</i>		
Percentage of workers who are not employees - Female (GRI 2-8-a)		15.3846%
<i>Affiliations: ESRS S1-7-55 to 56</i>		
Percentage of workers who are not employees - Other (GRI 2-8-a)		0.0000%
<i>Affiliations: ESRS S1-7-55 to 56</i>		
Percentage of workers who are not employees - Gender not disclosed (GRI 2-8-a)		0.0000%
<i>Affiliations: ESRS S1-7-55 to 56</i>		
Describe the most common types of workers who are not employees and their contractual relationship with the organization (GRI 2-8-a-i)		These individuals are Contractors, Service Providers, and Suppliers.
<i>Affiliations: ESRS S1-7-55 to 56 WDI Section 3: Workforce Composition - Direct Operations Section 6: Stability - Direct Operations</i>		
	The type of work they perform	Site or Task specific services - heavy equipment operators, mobile mechanics, drillers, geologists, mine modelers, and site maintenance contractors.
Describe the methodologies and assumptions used to compile the information about workers who are not employees. (GRI 2-8-b)		Total hours on site divided by 2080 hours per man.
<i>Affiliations: ESRS S1-7-55 to 56 UN SDGs 8 (8.5) WDI Section 3: Workforce Composition - Direct Operations Section 6: Stability - Direct Operations</i>		
Is the number of workers who are not employees reported in head count, full-time equivalent (FTE), or using another methodology		Full-time equivalent
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		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 (GRI 2-8-c)		There were no significant fluctuations in this category.
<i>Affiliations: ESRS S1-7-55 to 56 UN SDGs 8 (8.5) WDI Section 3: Workforce Composition - Direct Operations Section 6: Stability - Direct Operations</i>		
Number of workers who are not employees hired locally (ONYEN)		13
Number of workers who are not employees hired locally as a percent of total number of workers who are not employees (ONYEN)		100.0000%
Total Workforce		
Total workforce (includes direct employees and workers who are not employees) (GRI 2-7-a)		64
<i>Affiliations: ESRS ESRS 2 SBM-1-40 (a) iii, S1-6-50 (a) to (b) and (d) to (e), S1 to 52 GRI 102-8 IFRS-S2 EM-MM-000.B SASB EM-MM-000.B, TC-SI-330a.3 UN SDGs 10 (10.3), 8 (8.5) WDI Section 3: Workforce Composition - Direct Operations Section 6: Stability - Direct Operations WEF-MSc Pillar 4: Prosperity - Employment and wealth generation - Absolute number and rate of employment</i>		
Total female workforce (GRI 2-7-b-ii)		19

Affiliations: ESRS ESRS 2 SBM-1-40 (a) iii, S1-6-50 (a) to (b) and (d) to (e), 51 to 52 | GRI 102-8 | SASB EM-MM-000.B, TC-SI-330a.3 | UN SDGs 10 (10.3), 8 (8.5) | WDI Section 3: Workforce Composition - Direct Operations Section 6: Stability - Direct Operations | WEF-MSD Pillar 3: People - Dignity & Equality - Diversity and inclusion (%)

Female workforce as percentage of total employed workforce	29.6875%
Total male workforce (GRI 2-7-b-ii)	45
Affiliations: ESRS ESRS 2 SBM-1-40 (a) iii, S1-6-50 (a) to (b) and (d) to (e), 51 to 52 GRI 102-8 SASB EM-MM-000.B, TC-SI-330a.3 UN SDGs 10 (10.3), 8 (8.5) WDI Section 3: Workforce Composition - Direct Operations Section 6: Stability - Direct Operations WEF-MSD Pillar 3: People - Dignity & Equality - Diversity and inclusion (%)	
Male workforce as percentage of total employed workforce	70.3125%
Total Other workforce (GRI 2-7-b-ii)	0
Affiliations: ESRS ESRS 2 SBM-1-40 (a) iii, S1-6-50 (a) to (b) and (d) to (e), 51 to 52 GRI 102-8 SASB EM-MM-000.B, TC-SI-330a.3 UN SDGs 10 (10.3), 8 (8.5) WDI Section 3: Workforce Composition - Direct Operations Section 6: Stability - Direct Operations WEF-MSD Pillar 3: People - Dignity & Equality - Diversity and inclusion (%)	
Other workforce as percentage of total employed workforce	0.0000%
Total workforce with gender not disclosed (GRI 2-7-b)	0
Affiliations: ESRS ESRS 2 SBM-1-40 (a) iii, S1-6-50 (a) to (b) and (d) to (e), 51 to 52 GRI 102-8 SASB TC-SI-330a.3 UN SDGs 10 (10.3), 8 (8.5) WDI Section 3: Workforce Composition - Direct Operations Section 6: Stability - Direct Operations WEF-MSD Pillar 3: People - Dignity & Equality - Diversity and inclusion (%)	
Workforce with gender not disclosed as percentage of total employed workforce	0.0000%
Total number of direct employees in the active workforce (SASB EM-MM-000.B)	0
Affiliations: GRI 2-7-a	
Workers who are not employees (contractors) (SASB EM-MM-000.B)	0
Affiliations: GRI 2-8-a	
Total workforce (SASB EM-MM-000.B)	0
Affiliations: GRI 2-7-a	
Workers who are not employees (contractors) as percentage of total employed workforce (SASB EM-MM-000.B)	Does Not Apply
Affiliations: ESRS ESRS 2 SBM-1-40 (a) iii, S1-6-50 (a) to (b) and (d) to (e), 51 to 52 GRI 102-8a, 102-7 WDI Section 3: Workforce Composition - Direct Operations Section 6: Stability - Direct Operations WEF-MSD Pillar 3: People - Dignity & Equality - Diversity and inclusion (%)	
Total workforce who are hired locally (ONYEN)	64
Total workforce hired locally as a percent of total workforce (ONYEN)	100.0000%

Employment

Turnover & Gender Breakdown

Female direct employees: (GRI 401-1-b)

Affiliations: ESRS S1-6-50 (c) | GRI 102-7, 14.17.3 | IPIECA A1 SOC-6 | SASB EM-MM-000.B, SV-PS-330a.2, TC-SI-330a.3 | UN SDGs 10 (10.3), 5 (5.1), 8 (8.5), 8 (8.6) | WDI Section 3: Workforce Composition - Direct Operations Section 6: Stability - Direct Operations | WEF-MSD Pillar 4: Prosperity - Employment and wealth generation - Absolute number and rate of employment

Total number of turnover (the number of females that left during the period)	4	
		There were two individuals that left voluntarily for other opportunities. There were eight individuals that left involuntarily due to the reduction in force.
Rate of turnover, females	21.0526%	
Male direct employees: (GRI 401-1-b)		
Affiliations: ESRS S1-6-50 (c) GRI 102-7, 14.17.3 IPIECA A1 SOC-6 SASB EM-MM-000.B, SV-PS-330a.2, TC-SI-330a.3 UN SDGs 10 (10.3), 5 (5.1), 8 (8.5), 8 (8.6) WDI Section 3: Workforce Composition - Direct Operations Section 6: Stability - Direct Operations WEF-MSD Pillar 4: Prosperity - Employment and wealth generation - Absolute number and rate of employment		
Total number of turnover (the number of males that left during the period)	6	
Rate of turnover, males	17.3913%	

Other direct employees: (GRI 401-1-b)	
<i>Affiliations: ESRS S1-6-50 (c) GRI 102-7, 14.17.3 IPIECA A1 SOC-6 SASB EM-MM-000.B, SV-PS-330a.2, TC-SI-330a.3 UN SDGs 10 (10.3), 5 (5.1), 8 (8.5), 8 (8.6) WDI Section 3: Workforce Composition - Direct Operations Section 6: Stability - Direct Operations WEF-MSC Pillar 4: Prosperity - Employment and wealth generation - Absolute number and rate of employment</i>	
Total number of turnover (the number Other that left during the period)	0
Rate of turnover, Other	Does Not Apply
Gender not disclosed employees: (GRI 401-1-b)	
<i>Affiliations: ESRS S1-6-50 (c) GRI 14.17.3 SASB EM-MM-000.B, SV-PS-330a.2, TC-SI-330a.3</i>	
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: (GRI 401-1-b)	
<i>Affiliations: Bloomberg EMPLOYEE_TURNOVER ESRS S1-6-50 (c) GRI 102-7, 14.17.3 SASB EM-MM-000.B, SV-PS-330a.2, TC-SI-330a.3 UN SDGs 10 (10.3), 5 (5.1), 8 (8.5), 8 (8.6) WDI Section 3: Workforce Composition - Direct Operations Section 6: Stability - Direct Operations WEF-MSC Pillar 4: Prosperity - Employment and wealth generation - Absolute number and rate of employment</i>	
Total number of turnover (the number that left during the period)	10
Rate of turnover - direct employees	18.6916%
Turnover & Age Breakdown	
Direct Employees aged 30 years old and under: (GRI 401-1-b)	
<i>Affiliations: ESRS S1-6-50 (c) GRI 102-7, 14.17.3 IPIECA A1 SOC-6 SASB EM-MM-000.B, SV-PS-330a.2, TC-SI-330a.3 UN SDGs 10 (10.3), 5 (5.1), 8 (8.5), 8 (8.6) WDI Section 3: Workforce Composition - Direct Operations Section 6: Stability - Direct Operations WEF-MSC Pillar 4: Prosperity - Employment and wealth generation - Absolute number and rate of employment</i>	
Total number of turnover (the number that left during the period)	2
Number at end of period as percent of total direct employees	7.8431%
Rate of turnover	50.0000%
Direct Employees aged between 30 and 50 years old: (GRI 401-1-b)	
<i>Affiliations: ESRS S1-6-50 (c) GRI 102-7, 14.17.3 IPIECA A1 SOC-6 SASB EM-MM-000.B, SV-PS-330a.2, TC-SI-330a.3 UN SDGs 10 (10.3), 5 (5.1), 8 (8.5), 8 (8.6) WDI Section 3: Workforce Composition - Direct Operations Section 6: Stability - Direct Operations WEF-MSC Pillar 4: Prosperity - Employment and wealth generation - Absolute number and rate of employment</i>	
Total number of turnover (the number that left during the period)	5
Number at end of period as percent of total direct employees	41.1765%
Rate of turnover	23.2558%
Direct Employees over 50 years old: (GRI 401-1-b)	
<i>Affiliations: ESRS S1-6-50 (c) GRI 102-7, 14.17.3 IPIECA A1 SOC-6 SASB EM-MM-000.B, SV-PS-330a.2, TC-SI-330a.3 UN SDGs 10 (10.3), 5 (5.1), 8 (8.5), 8 (8.6) WDI Section 3: Workforce Composition - Direct Operations Section 6: Stability - Direct Operations WEF-MSC Pillar 4: Prosperity - Employment and wealth generation - Absolute number and rate of employment</i>	
Total number of turnover (the number that left during the period)	4
Number at end of period as percent of total direct employees	50.9804%
Rate of turnover	14.2857%
Identify types of employees captured in the turnover rate calculations (GRI 401-1-b)	All employees on the payroll
<i>Affiliations: ESRS S1-6-50 (c) GRI 102-7, 14.17.3 IPIECA A1 SOC-6 SASB EM-MM-000.B, SV-PS-330a.2, TC-SI-330a.3 UN SDGs 10 (10.3), 5 (5.1), 8 (8.5), 8 (8.6) WDI Section 3: Workforce Composition - Direct Operations Section 6: Stability - Direct Operations WEF-MSC Pillar 4: Prosperity - Employment and wealth generation - Absolute number and rate of employment</i>	
Average age of direct employees (GRI 401-1-b)	50
<i>Affiliations: Bloomberg EMPLOYEE_AVERAGE_AGE ESRS S1-6-50 (c) GRI 14.17.3 UN SDGs 10 (10.3), 5 (5.1), 8 (8.5), 8 (8.6) WEF-MSC Pillar 4: Prosperity - Employment and wealth generation - Absolute number and rate of employment</i>	

Diversity of Governance Bodies

The highest governance body (Board of Directors) (GRI 405-1-b)

Affiliations: ESRS ESRS 2 GOV-1-21 (d), S1-6-50 (a); S1-9-66 (a) to (b); S1-12-79 | GRI 13.15.2, 14.21.5 | IPIECA C2 SOC-5, C3 SOC-5 | UN SDGs 5 (5.1), 5 (5.5), 8 (8.5) | WEF-MSC Pillar 1: Principles of Governance - Quality of Governing Body - Governance body composition, Pillar 3: People - Diversity & Equality - Diversity & Inclusion (%)

Total Board of Directors	7
Percent of the highest governance body - Male	71.4286%
Percent of the highest governance body - Female	28.5714%
Percent of the highest governance body - Other	0.0000%
Percent of the highest governance body - Gender not disclosed	0.0000%
Percent of the highest governance body - under 30 years of age	0.0000%
Percent of the highest governance body - between 30 and 50 years of age	0.0000%
Percent of the highest governance body - over 50 years of age	100.0000%
Percent minority or vulnerable group individuals in the "highest governance body" category	14.2857%

Diversity of Direct Employees

Senior Management: (GRI 405-1)

Affiliations: ESRS ESRS 2 GOV-1-21 (d), S1-12-79, S1-6-50 (a); S1-9-66 (a) | GRI 102-22, 102-7, 13.15.2, 14.21.5 | IPIECA C2 SOC-5, C3 SOC-5 | SASB EM-MM-000.B, TC-SI-330a.3 | UN SDGs 5 (5.1), 5 (5.5), 8 (8.5) | WDI Section 3 - Workforce Composition - Direct Operations | WEF-MSC Pillar 3: People - Diversity & Equality - Diversity & Inclusion (%)

Total Senior Managers:	8
Percent Male	37.5000%
Percent Female	62.5000%
Percent Other	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	0.0000%
Percent over 50 years of age	87.5000%
Percent of minority or vulnerable group individuals in the "Senior Management Employee" category	12.5000%

Salaried (excluding Senior Management): (GRI 405-1)

Affiliations: ESRS ESRS 2 GOV-1-21 (d), S1-6-50 (a); S1-9-66 (a) to (b); S1-12-18 | GRI 102-22, 102-7, 14.21.5 | IPIECA C2 SOC-5, C3 SOC-5 | SASB EM-MM-000.B, TC-SI-330a.3 | WDI Section 3 - Workforce Composition - Direct Operations | WEF-MSC Pillar 3: People - Diversity & Equality - Diversity & Inclusion (%)

Total Salaried (excluding Senior Management)	12
Percent Male	66.6667%
Percent Female	33.3333%
Percent Other	0.0000%
Percent Gender not disclosed	0.0000%
Percent under 30 years of age	0.0000%
Percent between 30 and 50 years of age	58.3333%
Percent over 50 years of age	41.6667%
Percent of minority or vulnerable group individuals in the "Salaried Employee" category	8.3333%

Technical Employees (skilled hourly): (GRI 405-1)

Affiliations: ESRS ESRS 2 GOV-1-21 (d), S1-6-50 (a); S1-9-66 (a) to (b); S1-12-18 | GRI 102-22, 102-7,

Total Technical Employees	4
Percent Male	100.0000%
Percent Female	0.0000%
Percent Other	0.0000%
Percent Gender not disclosed	0.0000%
Percent under 30 years of age	25.0000%
Percent between 30 and 50 years of age	50.0000%
Percent over 50 years of age	25.0000%
Percent of minority or vulnerable group individuals in the "Technical employee" category	25.0000%
Production Employees (unskilled hourly): (GRI 405-1)	
<i>Affiliations: ESRS ESRS 2 GOV-1-21 (d), S1-6-50 (a); S1-9-66 (a) to (b); S1-12-18 GRI 102-22, 102-7, 14.21.5 IPIECA C2 SOC-5 SASB EM-MM-000.B WDI Section 3 - Workforce Composition - Direct Operations WEF-MSC Pillar 3: People - Diversity & Equality - Diversity & Inclusion (%)</i>	
Total Production Employees	28
Percent Male	67.8571%
Percent Female	32.1429%
Percent Other	0.0000%
Percent Gender not disclosed	0.0000%
Percent under 30 years of age	14.2857%
Percent between 30 and 50 years of age	71.4286%
Percent over 50 years of age	10.7143%
Percent of minority or vulnerable group individual in the "Production employee" category	0.0000%
All Other Categories of Direct Employees: (GRI 405-1)	
<i>Affiliations: ESRS ESRS 2 GOV-1-21 (d), S1-6-50 (a); S1-9-66 (a) to (b); S1-12-18 GRI 102-22, 102-7, 14.21.5 IPIECA C2 SOC-5 SASB EM-MM-000.B, TC-SI-330a.3 WDI Section 3 - Workforce Composition - Direct Operations WEF-MSC Pillar 3: People - Diversity & Equality - Diversity & Inclusion (%)</i>	
Total all other categories of direct employees	0
All Other direct employees: (SASB TC-SI-330a.3)	
<i>Affiliations: ESRS ESRS 2 GOV-1-21 (d), S1-6-50 (a); S1-9-66 (a) to (b); S1-12-18 GRI 405-1 UN SDGs 10 (10.2), 10 (10.3), 10 (10.7), 16 (16.b), 5 (5.1), 5 (5.5), 5 (5.c), 8 (8.5), 9 (9.5)</i>	
Total Other direct employees	0
Diversity of Workers Who Are Not Employees	
Workers who are not employees (GRI 405-1)	13
<i>Affiliations: ESRS ESRS 2 GOV-1-21 (d), S1-6-50 (a); S1-9-66 (a) to (b); S1-12-18 GRI 102-7, 102-22, 14.21.5 IPIECA C2 SOC-5 SASB EM-MM-000.B WDI Section 3 - Workforce Composition - Direct Operations WEF-MSC Pillar 3: People - Diversity & Equality - Diversity & Inclusion (%)</i>	
Number of Males	11
Number of Females	2
Number of Other	0
Number of Gender not disclosed	0
Labour Relations	
Collective Bargaining Agreements	
Percentage of total direct employees covered by collective bargaining agreements (%) (GRI 2-30-a)	0.0000%

Affiliations: ESRS S1-8-60 (a) and 61 | GRI 102-41, 407 | SASB EM-MM-310a.1 | UN SDGs 8 (8.8) | WDI Section 7: Training and Development - Direct Operations, Section 9: Worker Voice and Representation - Direct Operations

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 (GRI 2-30-b)

Not Applicable

Affiliations: ESRS S1-8-61 | UN SDGs 8 (8.8)

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 (GRI 402-1-a)

2

Affiliations: ESRS ESRS 1-11 and MDR-M | GRI 102-41, 407, 14.17.6, 14.8.2 | SASB EM-MM-310a.1 | UN SDGs 8 (8.8) | WDI Section 9: Worker Voice and Representation - Direct Operations Section 13: Supply Chain Working Conditions - Supply Chain

Two weeks are typically provided to all employees affected by the operational change.

If your organization is subject to collective bargaining agreements, is the notice period and provisions for consultation and negotiation specified in those agreements (GRI 402-1-b)

Not applicable

Affiliations: ESRS ESRS 1-11 and MDR-M | GRI 102-41, 407, 14.17.6 | SASB EM-MM-310a.1 | UN SDGs 8 (8.8) | WDI Section 9: Worker Voice and Representation - Direct Operations Section 13: Supply Chain Working Conditions - Supply Chain

Occupational Health and Safety

Work-related Injuries

Injuries - direct employees: (GRI 403-9-a)

Affiliations: Bloomberg WORK_ACCIDENTS_EMPLOYEES | ESRS S1-4-38 (a); S1-14-88 (b) and (c); AR 82 | GRI 13.19.10, 14.16.10 | IPIECA C1 SHS-3 | SASB EM-EP-320a.1, EM-MM-320a.1, FB-AG-320a.1, IF-HB-320a.1 | UN SDGs 16 (16.1), 3 (3.6), 3 (3.9), 8 (8.8) | WDI Section 8 - Health, Safety and Wellbeing - Direct Operations | WEF-MSA Pillar 3: People - Health & Well Being - Health and safety (%)

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
Total recordable work-related injuries rate	0.000
Main types of work-related injury, e.g., confined space, trips, falls, etc.	Not applicable
Number of hours worked	86,593
Total recordable incidents for work-related injuries and illnesses	0
Lost Time Injuries (LTIs)	0
Lost Time Injury Rate (LTIR)	0.000
Total recordable incident rate (TRIR) for work-related injuries and illnesses (all incidents rate) - direct employees (SASB IF-EU-320a.1.1)	0.000
Affiliations: GRI 13.19.10, 14.16.10 SASB IF-HB-320a.1	
Number of hours worked by all direct employees in the reporting period	86,593.000
Fatality rate for work-related fatalities - direct employees (SASB IF-EU-320a.1.2)	0.000
Affiliations: SASB EM-MM-320a.1.2	
Number of fatalities - direct employees	0
Near miss frequency rate (NMFR) for work-related near misses - direct employees (SASB IF-EU-320a.1.3)	0.000
Affiliations: GRI 13.19.10, 14.16.10, 403-9 SASB EM-MM-320a.1.3	
Number of near misses - direct employees	0

Injuries - workers who are not employees, but whose work and/or workplace is controlled by the organization: (GRI 403-9-b)	
<i>Affiliations: GRI 13.19.10, 14.16.10 IPIECA C1 SHS-3 SASB EM-EP-320a.1, EM-MM-320a.1, FB-AG-320a.1, IF-HB-320a.1 UN SDGs 16 (16.1), 3 (3.6), 3 (3.9), 8 (8.8) WDI Section 8 - Health, Safety and Wellbeing - Direct Operations WEF-MS C Pillar 3: People - Health & Well Being - Health and safety (%)</i>	
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
Total recordable work-related injuries rate	0.000
Main types of work-related injury, e.g., confined space, trips, falls, etc.	Not applicable. In 2025, there were no high-consequence work-related injuries.
Number of hours worked	27,140
Total number of work-related injuries for workers who are not employees (total recordable incidents for work-related injuries and illnesses)	0
Lost Time Injuries (LTIs)	0
Lost Time Injury Rate (LTIR)	0.000
Total recordable incident rate (TRIR) for work-related injuries and illnesses (all incidents rate) - workers who are not employees (SASB IF-EU-320a.1.6)	0.000
<i>Affiliations: GRI 13.19.10, 14.16.10</i>	
Number of hours worked by all workers who are not-employees in the reporting period	0.000
Fatality rate for work-related fatalities - workers who are not employees (SASB IF-EU-320a.1.6)	0.000
<i>Affiliations: SASB EM-EP-320a.1, EM-MM-320a.1, FB-AG-320a.1, IF-HB-320a.1</i>	
Number of fatalities - workers who are not employees	0
Near miss frequency rate (NMFR) for work-related near misses - workers who are not employees (SASB IF-EU-320a.1.6)	0.000
<i>Affiliations: GRI 13.19.10, 14.16.10, 403-9 SASB EM-EP-320a.1, EM-MM-320a.1, FB-AG-320a.1, IF-HB-320a.1</i>	
Number of near misses - workers who are not employees	0
Combined (Employees and non-employees, but controlled by the organization): (GRI 403-9-a,b)	
<i>Affiliations: GRI 13.19.10, 14.16.10 IPIECA C1 SHS-3 SASB EM-EP-320a.1, EM-MM-320a.1, IF-HB-320a.1 UN SDGs 16 (16.1), 3 (3.6), 3 (3.9), 8 (8.8) WDI Section 8 - Health, Safety and Wellbeing - Direct Operations WEF-MS C Pillar 3: People - Health & Well Being - Health and safety (%)</i>	
Total Hours Worked	113,733
Total number of all recordable work-related injuries	0
Total recordable work-related injuries rate	0.000
Total Lost Time Injuries (LTIs)	0
Lost Time Injury Rate (LTIR)	0.000
Total recordable incident rate (TRIR) for work-related injuries and illnesses - Combined (Employees and non-employees, but controlled by the organization) (SASB IF-EU-320a.1.6)	0.000
Total number of recordable incidents for work-related injuries and illnesses - Combined (Employees and non-employees, but controlled by the organization)	0
Total Hours Worked - Combined (Employees and non-employees, but controlled by the organization)	86,593.000
Fatality rate for work-related fatalities - Combined (Employees and non-employees, but controlled by the organization) (SASB IF-EU-320a.1.6)	0.000
Number of fatalities - Combined (Employees and non-employees, but controlled by the organization)	0
Near miss frequency rate (NMFR) for work-related near misses - Combined (Employees and non-employees, but controlled by the organization) (SASB IF-EU-320a.1.6)	0.000

Affiliations: GRI 13.19.10, 14.16.10 Number of near misses - Combined (Employees and non-employees, but controlled by the organization)	0
What is the process for classifying, identifying and reporting near misses (SASB IF-EU-320a.1.6) Affiliations: GRI 13.19.10, 14.16.10	Near-miss incidents are treated with the same procedures as an accident - immediate report to the supervisor, Safety Department, and Senior Management.
Report the work-related hazards that pose a risk of high-consequence injury, including: (GRI 403-9-c) Affiliations: GRI 13.19.10, 14.16.10 IPIECA C1 SHS-3 SASB EM-EP-320a.1, EM-MM-320a.1 UN SDGs 16 (16.1), 3 (3.6), 3 (3.9), 8 (8.8) WDI Section 8 - Health, Safety and Wellbeing - Direct Operations	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	Not applicable. There were no high consequence injuries during the reporting period.
Actions taken or underway to eliminate these hazards and minimize risks using the hierarchy of controls	Not applicable. There were no high consequence injuries during the reporting period, however, Hycroft is actively engaged in continuous improvement assessments to identify potential hazards and minimize their potential risks to human safety and the environment.
Report on actions taken or underway to eliminate other work-related hazards and minimize risks using the hierarchy of controls (GRI 403-9-d) Affiliations: ESRS S1-4-38 (a); S1-14-88 (b) and (c); AR 82 GRI 13.19.10, 14.16.10 IPIECA C1 SHS-3 SASB EM-EP-320a.1, EM-MM-320a.1 UN SDGs 16 (16.1), 3 (3.6), 3 (3.9), 8 (8.8) WDI Section 8 - Health, Safety and Wellbeing - Direct Operations	Improved housekeeping and improved pre-task planning.
Have rates been calculated based on 200,000 or 1,000,000 hours worked (GRI 403-9-e) Affiliations: ESRS S1-4-38 (a); S1-14-88 (b) and (c); AR 82 GRI 13.19.10, 14.16.10 IPIECA C1 SHS-3 SASB EM-EP-320a.2, EM-MM-320a.1 UN SDGs 16 (16.1), 3 (3.6), 3 (3.9), 8 (8.8) WDI Section 8 - Health, Safety and Wellbeing - Direct Operations	200,000 hours worked
Were any workers excluded from this disclosure (GRI 403-9-f) Affiliations: GRI 13.19.10, 14.16.10 IPIECA C1 SHS-3 SASB EM-EP-320a.3, EM-MM-320a.1 UN SDGs 16 (16.1), 3 (3.6), 3 (3.9), 8 (8.8) WDI Section 8 - Health, Safety and Wellbeing - Direct Operations	No
Disclose any contextual information necessary to understand how the data has been compiled, i.e., any standards, methodologies, and assumptions used (GRI 403-9-g) Affiliations: GRI 13.19.10, 14.16.10 IPIECA C1 SHS-3 SASB EM-EP-320a.4, EM-MM-320a.1 UN SDGs 16 (16.1), 3 (3.6), 3 (3.9), 8 (8.8) WDI Section 8 - Health, Safety and Wellbeing - Direct Operations	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 (GRI 403-5-a) Affiliations: ESRS ESRS 1-11 and MDR-M GRI 13.19.6, 14.16.6 IPIECA C2 SHS-1 SASB EM-MM-320a.1 UN SDGs 8 (8.8) WDI Section 8 - Health, Safety and Wellbeing - Direct Operations	Everyone at Hycroft is required to attend 24-hr New Employee Training and 8-hr Annual Refresher Training.
Average number of training hours per person on health, safety, and emergency response provided to: full-time/direct employees (SASB EM-MM-320a.1.)	20.94
Average training hours per person on health, safety, and emergency response for workers who are not employees (contractors) (SASB EM-MM-320a.1.) Affiliations: GRI 102-7, 102-8, 403-9, 403-10	2
Conflict-affected and high-risk areas	
Adherence to Laws and Due Diligence	
Describe the approach to ensuring adherence to international humanitarian law when operating in conflict-affected and high-risk areas (GRI 14.25.1)	Not applicable.
List the locations of operations in conflict-affected or high-risk areas (GRI 14.25.2)	None

How were these identified	Not applicable.
Describe the due diligence process applied for operations in, or when sourcing from, conflict-affected and high-risk areas and (GRI 14.25.3)	Not applicable.
Did the due diligence process align with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (GRI 14.25.3)	Yes
Report the potential negative impacts on workers and local communities, including actions to prevent or mitigate the impacts (GRI 14.25.4)	Not applicable.
Security, Human Rights and Rights of Indigenous People	
Describe the nature of any social risks, for all operating countries, that could have a material impact on the operations (ONYEN) <i>Affiliations: SASB EM-MM-210a.3</i>	Not applicable.
Percentage of proven reserves that are located in or near areas of active conflict (SASB EM-MM-210a.1.1) <i>Affiliations: SASB EM-EP-210a.1.1 UN SDGs 1 (1.4), 11 (11.4), 16 (16.a)</i>	Does Not Apply
The total amount of proven reserves	0.000
Grade of proven reserves located in or near areas of active conflict - Metals (SASB EM-MM-210a.1.1)	
Gold (Au) (grams per tonne)	0.000
Silver (Ag) (grams per tonne)	0.000
Percentage of probable reserves that are located in or near areas of active conflict (SASB EM-MM-210a.1.2) <i>Affiliations: SASB EM-EP-210a.2 UN SDGs 1 (1.4), 11 (11.4), 16 (16.a)</i>	Does Not Apply
The total amount of probable reserves	0.000
Grade of probable reserves locate in or near areas of active conflict - Metals (SASB EM-MM-210a.1.2)	
Gold (Au) (grams per tonne)	0.000
Silver (Ag) (grams per tonne)	0.000
Percentage of proven reserves that are located in or near areas that are considered to be indigenous peoples' land (SASB EM-MM-210a.2.1) <i>Affiliations: GRI 14.11.3 SASB EM-EP-210a.2 UN SDGs 1 (1.4), 11 (11.4), 16 (16.a)</i>	Does Not Apply
Amount of proven reserves located in or near areas that are considered to be indigenous peoples' land	0.000
The total amount of proven reserves	0.000
Grade of proven reserves locate in or near areas that are considered to be indigenous peoples' land - Metals (SASB EM-MM-210a.1.2)	
Gold (Au) (grams per tonne)	0.000
Silver (Ag) (grams per tonne)	0.000
Percentage of probable reserves that are located in or near areas that are considered to be indigenous peoples' land (SASB EM-MM-210a.2.1) <i>Affiliations: SASB EM-EP-210a.3 UN SDGs 1 (1.4), 11 (11.4), 16 (16.a)</i>	Does Not Apply
Amount of probable reserves located in or near areas that are considered to be indigenous peoples' land	0.000
The total amount of probable reserves	0.000
Grade of probable reserves located in or near areas that are considered to be indigenous peoples' land - Metals (SASB EM-MM-210a.1.2)	
Gold (Au) (grams per tonne)	0.000
Silver (Ag) (grams per tonne)	0.000
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. (SASB EM-MM-210a.3.1) <i>Affiliations: SASB EM-EP-210a.3 UN SDGs 1 (1.4), 11 (11.4), 16 (16.a)</i>	Other, please specify

	Not applicable. Hycroft does not operate or intends to operate on land considered to be indigenous people's land.
<p>Which human rights procedures the entity's due diligence practices include, provide description in the details (SASB EM-MM-210a.3.2)</p> <p><i>Affiliations: SASB EM-EP-210a.3 UN SDGs 1 (1.4), 11 (11.4), 16 (16.a)</i></p>	<p>Other, please specify</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>Discuss the practices and procedures while operating in areas of conflict, describing the approach according to the Five-Step Framework outlined in the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (SASB EM-MM-210a.3.3)</p> <p><i>Affiliations: SASB EM-MM-210a.1, EM-MM-210a.2 UN SDGs 1 (1.4), 11 (11.4), 16 (16.a)</i></p>	<p>Not Applicable.</p>
	<p>Not applicable. Hycroft does not operate or intends to operate on land considered to be indigenous people's land.</p>
<p>Rights of Indigenous Peoples</p> <p>Describe the approach to identifying Indigenous Peoples who are or could be affected by the organization's activities (GRI 14.11.1)</p>	<p>Not applicable</p> <p>Not applicable. Hycroft does not operate or intends to operate on land considered to be indigenous people's land.</p>
<p>Has the organization been involved in a process of seeking free, prior, and informed consent (FPIC) from Indigenous Peoples for any of its activities (GRI 14.11.4)</p>	<p>No</p>
<p>Incidents of Violations of Rights of Indigenous Peoples</p> <p>Describe the identified incidents of violations involving the rights of Indigenous Peoples (GRI 14.11.2)</p>	<p>Not applicable</p> <p>Not applicable. Hycroft does not operate or intends to operate on land considered to be indigenous people's land.</p>
<p>Land and Resource Rights</p>	
<p>Commitments</p>	
<p>Describe the approach to engaging with stakeholders whose rights to land and resources are or could be affected by the organization's activities (GRI 14.12.1)</p>	<p>Not applicable.</p> <p>The Mine property consists of 31 private parcels with patented claims that comprise approximately 1,787 acres, and 3,247 unpatented lode and placer mining claims that encompass approximately 62,298 acres. The combined patented and unpatented claims comprise approximately 64,085 acres. Much of the project area is located on private land owned or controlled by Hycroft.</p>
<p>How does the organization seek to ensure meaningful engagement</p>	<p>Hycroft is committed to open dialog with neighbors, community members, regulators, and interested parties. Members of senior staff are available and proactively participate in open conversations within the community.</p>
<p>How does the organization support safe and equitable gender participation</p>	<p>Hycroft promotes safety and equitable gender participation through community events, open house tours, active participation in the Nevada Mining Association, and supporting local events in the Winnemucca community.</p>
<p>Describe the policies, commitments, and plans providing remediation to local communities or individuals subject to involuntary resettlement, and the process for establishing compensation for loss of assets, or other assistance to improve or restore standards of living or livelihoods (GRI 14.12.1)</p>	<p>Not applicable.</p>
<p>Describe the procedures in place to monitor and evaluate the effectiveness of the actions taken to remediate negative impacts from involuntary resettlement and the corrective actions taken where necessary (GRI 14.12.1)</p>	<p>Not applicable.</p>

List the mine sites where involuntary resettlement is planned, ongoing, or has taken place (GRI 14.12.2)	Not applicable. There are no resettlement activities in the past, currently planned, or required for future mine development.
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Human Rights Assessment


Operations Subject to Reviews and Assessments

Total number of operations that have been subject to human rights reviews or human rights impact assessments (GRI 412-1-a)	0
<i>Affiliations: SASB EM-MM-210a.3 WDI Section 2: Risk Assessment and Human Rights Due Diligence - Direct Operations and Supply Chain Section 9: Worker Voice and Representation - Direct Operations</i>	
Total percentage of operations that have been subject to human rights reviews or human rights impact assessments (GRI 412-1-a)	Does Not Apply
<i>Affiliations: WDI Section 2: Risk Assessment and Human Rights Due Diligence - Direct Operations and Supply Chain Section 9: Worker Voice and Representation - Direct Operations</i>	
Provide details about any human rights conducted assessments (ONYEN)	Not applicable.
Percentage of suppliers assessed for human rights impacts (%) (ONYEN)	0

Local Communities

Operations with Local Community

Describe the approach to identifying stakeholders, including vulnerable groups, within local communities (GRI 14.10.1)	Hycroft has proactively engaged and supported the Northern Nevada, including the Winnemucca community.
	
2024 Community Programs	

Describe the approach to engaging with local communities at each phase of the life of the mine (GRI 14.10.1)	See attached Communities Policy.
	
Communities Policy	


How does the organization seek to ensure meaningful engagement	Hycroft is committed to supporting the local and regional community.
How does the organization support safe and equitable gender participation	The Hycroft Communities Policy is supported by our value-based culture and social performance principles.
Describe the approach to developing and implementing community development programs, including how engagement with local stakeholders, impact assessments, and community needs assessments have informed the programs (GRI 14.10.1)	See Community Policy.

Community Relations

Artisanal and Small-Scale Mining (ASM)

Describe the approach to engaging with ASM operators, and the actions taken by the organization to support ASM formalization and professionalization efforts (GRI 14.13.1)	Hycroft does not operate in areas adjacent to artisanal or small-scale mining operations.
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) (GRI MM Supplement MM8-2.2)	0
<i>Affiliations: UN SDGs 1 (1.4), 12 (12.4), 2 (2.3), 3 (3.9), 6 (6.3), 6 (6.6), 8 (8.8)</i>	

Programs

Report on community relations programs, objectives and achievements in the past 3 years (ONYEN)	Hycroft has proactively engaged and supported the community.
	
2024 Community Programs	

Risks and Opportunities

Disclose the total number of site shutdowns or project delays due to non-technical factors (SASB EM-MM-210b.2.1) 0

Affiliations: CDP C2.3, C2.4, C3.1, W3.3, W4.1, W4.2, W4.32 | GRI 201-1, 201-4 | UN SDGs 1 (1.4), 11 (11.4), 16 (16.a)

Disclose the total aggregate duration (in days) of site shutdowns or project delays due to non-technical factors (SASB EM-MM-210b.2.1) 0

Affiliations: CDP C2.3, C2.4, C3.1, W3.3, W4.1, W4.2, W4.32 | GRI 201-1, 201-4 | UN SDGs 1 (1.4), 11 (11.4), 16 (16.a)

Discuss specific delays including associated costs, root cause and corrective actions for resolved delay, and status of ongoing delays (SASB EM-MM-210b.2.4) None.

Affiliations: CDP C2.3, C2.4, C3.1, W3.3, W4.1, W4.2, W4.32 | GRI 201-1, 201-4 | UN SDGs 1 (1.4), 11 (11.4), 16 (16.a)

Economic Impacts

Local Hiring

Percentage of workers hired from the local communities (per site) (GRI 14.9.6) 100.0000%

Total local community workers (GRI 14.9.6) 51

Local community workers - male 34

Local community workers - female 17

Local community workers - Other 0

Local community workers - gender not disclosed 0

Total site workers (GRI 14.9.6) 51

Governance

Delegation of responsibility for managing impacts

Has the highest governance body 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.) (GRI 2-13-a-i) Yes

Affiliations: CDSB REQ-01 | ESRS ESRS 2 GOV-1-22 (c) i; GOV-2-26 (a), G1-3-18 (c) | GRI 102-22, 405-1 | IFRS-S1 S1.27-a | IPIECA A1 GOV-1, C1 GOV-1

Has the highest governance body delegated responsibility for the management of impacts to other employees (GRI 2-13-a-ii) Yes

Affiliations: CDSB REQ-01 | ESRS ESRS 2 GOV-1-22 (c) i; GOV-2-26 (a), G1-3-18 (c) | GRI 102-19, 405-1 | IFRS-S1 S1.27-a | IPIECA A1 GOV-1, C1 GOV-1

Describe the process for senior executives or other employees to report back to the highest governance body on the management of the organization's impacts on the economy, environment and people, including sustainability-related risks and opportunities (GRI 2-13-b) 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. The CEO and other senior executives formally report to the Board of Directors each quarter, and on an as needed basis between quarterly meetings.

Affiliations: ESRS ESRS 2 GOV-1-22 (c) i; GOV-2-26 (a), G1-3-18 (c) | IFRS-S1 S1.27-a-iii | WEF-MSC Pillar 1 (Expanded Metrics & Disclosures) - Principles of Governance - Risk and Opportunity Oversight - Economic, environmental and social topics in capital allocation framework

Frequency for senior executives or other employees to report back to the highest governance body on the management of the organization's impacts (GRI 2-13-b) Quarterly

Governance Body

Identity of governance body(ies) or individual(s) responsible for oversight of risks and opportunities (IFRS-S1 S1.27-a)

Affiliations: IFRS-S2 S2.6-a-1

Hydro Mining's Board of Directors is responsible for oversight of sustainability-related risks and opportunities, with the Environmental, Social and Governance Committee providing direct oversight. The Chief Executive Officer implements the Sustainability Policy across all corporate and operating locations. Sustainability responsibilities are embedded in Board committee charters, corporate policies, and employee job descriptions. The Nominating and Governance Committee annually assesses Board members' skills and competencies to oversee sustainability strategies, considering independence, diversity, experience, and time availability. The Board integrates sustainability-related risks and opportunities into the entity's strategy, major transaction

	<p>decisions, and risk management processes through structured oversight mechanisms that ensure ESG considerations are incorporated throughout planning and decision-making. The Board oversees target setting by delegating implementation to executive leadership and sustainability management, with performance indicators for safety, environmental compliance, human rights, and stakeholder engagement reviewed periodically by the Sustainability Committee.</p>
<p>How responsibilities for sustainability-related risks and opportunities are reflected in the terms of reference, mandates, role descriptions and other related policies applicable to the governance body or individual(s) (IFRS-S1 S1.27-a-i)</p> <p><i>Affiliations: CSDS 1.27-a-i ESRS ESRS 2 GOV-1-22 (a) and (b)</i></p>	<p>Sustainability-related risks and opportunities are reflected in various ways, including within Board committee charters, corporate policies, and employee job descriptions.</p>
<p>How the governance body or individual(s) determine whether appropriate skills and competencies are available or will be developed to oversee strategies designed to respond to sustainability-related risks and opportunities (IFRS-S1 S1.27-a-ii)</p> <p><i>Affiliations: CSDS 1.27-a-ii ESRS ESRS 2 GOV-1-23 (a) and (b)</i></p>	<p>The Nominating and Governance Committee is responsible for reviewing with the Board, on an annual basis, the requisite skills and characteristics of new Board members as well as the composition of the Board as a whole. This assessment will include members' qualification as independent, as well as consideration of diversity, age, skills, experience in the context of the needs of the Board and ability to devote adequate time to Board duties.</p>
<p>How and how often the body(ies) or individual(s) is informed about sustainability-related risks and opportunities (IFRS-S1 S1.27-a-iii)</p>	<p>The Board of Directors and ESG Committee are informed about sustainability-related risks and opportunities through regular reporting mechanisms and periodic reviews. Management presents information on sustainability matters during scheduled Board meetings, with the ESG Committee reviewing performance indicators for safety, environmental compliance, human rights, and stakeholder engagement on a periodic basis. Risk assessments are conducted quarterly by senior management to identify potentially new or emerging sustainability risks, and the Board receives briefings from management as needed on material sustainability developments. Additionally, the Board makes periodic visits to the Hycroft Mine to familiarize itself with operational matters and review relevant objectives and performance with respect to health, safety, environment, and social responsibility.</p>
<p>How the governance body or individual(s) takes into account sustainability-related risks and opportunities when overseeing: a) the entity's strategy, b) its decisions on major transactions and c) its risk management processes and related policies, including whether the body(s) or individual(s) has considered trade-offs associated with those risks and opportunities (IFRS-S1 S1.27-a-iv)</p> <p><i>Affiliations: CSDS 1.27-a-iii ESRS ESRS 2 GOV-1-23 (b), ESRS 2 GOV-26 (b)</i></p>	<p>The governance body through the Sustainability Committee and relevant individuals take sustainability-related risks and opportunities into account through structured oversight mechanisms embedded in the organization's strategic, operational, and risk management processes. This includes incorporating ESG considerations into the entity's overall strategy, ensuring that major transactions are assessed for their environmental and social implications, and aligning risk management policies with sustainability objectives. This ensures that sustainability is not treated as a standalone initiative but is integrated across all levels of planning and decision-making. By doing so, we aim to promote long-term value creation, regulatory compliance, and stakeholder trust.</p>
<p>The governance body or individual(s) considered trade-offs associated with those risks and opportunities, provide details (IFRS-S1 S1.27-a-iv)</p> <p><i>Affiliations: CSDS 1.27-a-iv ESRS ESRS 2 GOV-1-23 (b)</i></p>	<p>True</p>
<p>How the governance body or individual(s) oversees the setting of targets and monitors progress towards these targets related to sustainability-related risks and opportunities (IFRS-S1 S1.27-a-v)</p> <p><i>Affiliations: CSDS 1.27-a-v ESRS ESRS 2 GOV-1-22 (d)</i></p>	<p>The governance body oversees target setting by delegating implementation to executive leadership and sustainability management, ensuring alignment with the company's ESG priorities. Targets include performance indicators for safety, environmental compliance, human rights, and stakeholder engagement, and are reviewed periodically by the Sustainability Committee for relevance and effectiveness.</p>
<p>How related performance metrics are included in remuneration policies (IFRS-S1 S1.27-a-v)</p> <p><i>Affiliations: CSDS 1.27-a-v ESRS ESRS 2 GOV-1-22 (d)</i></p>	<p>Hycroft Mining's Compensation Committee has implemented compensation policies that link a portion of senior executives' cash compensation to environmental, social and</p>

governance performance objectives. Senior executives have measurable key performance indicators directly linked to ESG targets, including safety, environmental compliance, human rights and stakeholder engagement metrics. These sustainability-related performance metrics are reviewed by the Compensation Committee and presented to the Board of Directors, ensuring that executive remuneration is aligned with the company's ESG priorities and integrated into the overall remuneration framework to incentivize management accountability for sustainability outcomes.

Performance metrics are included in remuneration policies

False

Management's role

What is the management's role in the governance processes, controls and procedures used to monitor, manage and oversee sustainability-related risks and opportunities (IFRS-S1 S1.27-b)

Affiliations: CSDS 1.27-b | ESRs ESRs 2 GOV-1-22 (c) i, ii, iii

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.

Management's role in governance processes, controls and procedures used to monitor, manage and oversee risks and opportunities is delegated to specific position or committee

False

Disclose how oversight is exercised over that position or committee

The CEO reports directly to the Board of Directors and is accountable for the implementation and adherence to sustainability policies across all corporate and operational activities. The CEO's responsibilities include managing impacts on the economy, environment, and people, with day-to-day environmental and social impact management delegated to the Environmental Manager. Senior executives formally report to the Board quarterly and on an as-needed basis, providing updates on sustainability-related risks and opportunities. The management team supervises sustainability risk prevention, detection, mitigation, and remediation efforts through internal security personnel, threat intelligence, external consultants, and deployed security tools. These sustainability controls and cybersecurity risk management procedures are integrated across health and safety, community engagement, human rights, and regulatory compliance functions through training, transparent communication, incident reporting,

and continuous stakeholder engagement, ensuring alignment with the company's sustainability objectives and governance expectations.

Management uses controls and procedures to support oversight of risks and opportunities (IFRS-S1 S1.27-b-ii)

True

Affiliations: CSDS 1.27-b-ii | ESRs ESRs 2 GOV-1-22 (c) i, ii, iii

If so, how these controls and procedures are integrated with other internal functions

Hycroft integrates sustainability and cybersecurity controls with other internal functions through a cohesive governance framework that embeds environmental, social, and governance considerations across all operational areas. The CEO, as the primary accountability holder for sustainability implementation, ensures alignment between sustainability objectives and core business functions including health and safety, community engagement, human rights, and regulatory compliance. Controls are reinforced through mandatory training programs, transparent communication protocols, incident reporting mechanisms, and continuous stakeholder engagement that cascade throughout the organization. The cybersecurity risk management program operates in parallel, with the Information Systems Manager overseeing prevention, detection, mitigation, and remediation efforts supported by internal security personnel and external consultants. Both frameworks report to the Board of Directors through the CEO and relevant board committees, creating integrated oversight that ensures sustainability and risk management are not treated as standalone initiatives but as essential components of strategic decision-making and daily operational execution across all departments and business relationships.

Oversight

Other disclosures about governance processes, controls and procedures used to monitor, manage and oversee risks and opportunities (IFRS-S1 S1.26)

Hycroft Mining's governance processes, controls and procedures for monitoring, managing and overseeing risks and opportunities are embedded within a structured framework involving the Board of Directors and its standing committees. The Board delegates specific matters to each committee to ensure sustainability considerations are integrated throughout the organization. The Environmental, Social and Governance Committee has direct oversight of the majority of environmental and social impacts, while the Audit Committee oversees cybersecurity and information technology risks. Management's role is coordinated through the Chief Executive Officer, who has been assigned responsibility for implementation and adherence to the Sustainability Policy across corporate and operational activities. The company integrates ESG considerations into strategic planning, risk management and decision-making processes through stakeholder engagement, regulatory compliance adherence and periodic reviews of governance policies and board charters. Management regularly updates the full Board on major initiatives, strategies and enterprise risks at least annually, while the Board reviews technical studies, environmental impact studies and monitors compliance with environmental permits and regulations. All governance policies and board and committee charters are reviewed annually to assess alignment with the company's needs and evolving regulatory frameworks.

Climate-related disclosures

Governance Body

Climate-related performance metrics are included in remuneration policies

False

Integrated disclosure

Topic(s) covered by integrated governance disclosure (IFRS-S2 S2.7)

Hycroft Mining's governance structure integrates sustainability considerations across all levels of the organization through its Board

of Directors and standing committees. The Environmental, Social and Governance Committee has direct oversight of the majority of environmental and social impacts, while the Board delegates specific matters to each committee to ensure sustainability is embedded in business decision-making. Senior executives formally report to the Board quarterly on the management of environmental and social impacts, risks and opportunities. The company's governance policies, board and committee charters, and employee job descriptions reflect sustainability-related risks and opportunities. Board members receive training on ESG topics identified as material to the company, and the Nominating and Governance Committee annually reviews the requisite skills and characteristics needed for effective Board oversight of sustainability strategies and risks.

Policy commitments

Provide a description of the organization's policy commitments for responsible business conduct (GRI 2-23-a)

Affiliations: ESRS ESRS 2 GOV-4; MDR-P-65 (b) to (c) and (f), G1-1-7 and AR 1 (b), S1-1-19 to 21, AR 14, S2-1-16 to 17, 19, and AR 16, S3-1-14, 16 to 17 and AR 11, S4-1-15 to 17, AR 13 | GRI 102-16 | IPIECA C2 GOV-1 | SASB EM-MM-501a.2, EM-MM-510a.1 | UN SDGs 16 (16.3)

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

- (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.

What are (if any) the authoritative intergovernmental instruments that the commitments reference (GRI 2-23-a-i)

Affiliations: ESRS ESRS 2 GOV-4; MDR-P-65 (b) to (c) and (f), G1-1-7 and AR 1 (b), S1-1-19 to 21, AR 14, S2-1-16 to 17, 19, and AR 16, S3-1-14, 16 to 17 and AR 11, S4-1-15 to 17, AR 13 | UN SDGs 16 (16.3)

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.

Do the commitments stipulate conducting due diligence (GRI 2-23-a-ii)

No

Affiliations: UN SDGs 16 (16.3)

Do the commitments stipulate applying the Precautionary Principle or Approach (see instructions). (GRI 2-23-a-iii) <i>Affiliations: UN SDGs 16 (16.3)</i>	Yes
Do the commitments stipulate respecting human rights (GRI 2-23-a-iv) <i>Affiliations: ESRS ESRS 2 GOV-4; MDR-P-65 (b) to (c) and (f), G1-1-7; AR 1 (b), S1-1-19 to 21; AR 14, S2-1-16 to 17, 19; AR 16, S3-1-14, 16 to 17; AR 11, S4-1-15 to 17; AR 13 UN SDGs 16 (16.3)</i>	Yes
Describe the specific policy commitment to respect human rights (GRI 2-23-b) <i>Affiliations: ESRS ESRS 2 GOV-4; MDR-P-65 (b) to (c), (f), G1-1-7; AR 1 (b), S1-1-19 to 21; AR 14, S2-1-16 to 17, 19; AR 16, S3-1-14, 16 to 17; AR 11, S4-1-15 to 17; AR 13 UN SDGs 16 (16.3)</i>	<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.
What are (if any) the internationally recognized human rights that the commitment covers	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.
What are the categories of stakeholders, including at-risk or vulnerable groups, that the organization gives particular attention to in the commitment	Hycroft applies its policy commitments equally to all humans.
Are the policy commitments publicly available (GRI 2-23-c) <i>Affiliations: UN SDGs 16 (16.3)</i>	Yes
Provide links to the policy commitments, if publicly available, or, if the policy commitments are not publicly available, explain the reason for this (GRI 2-23-c) <i>Affiliations: UN SDGs 16 (16.3)</i>	<p>Link to the Policy Commitments below</p> <p>Hycroft's Sustainability Commitments</p>
Report the level at which each policy commitment was approved within the organization, including whether this is the most senior level (GRI 2-23-d) <i>Affiliations: ESRS ESRS 2 GOV-4; MDR-P-65 (c) and (f), G1-1-7; AR 1 (b), S1-1-19 to 21; AR 14, S2-1-16 to 17, 19; AR 16, S3-1-14, 16 to 17; AR 11, S4-1-15 to 17; AR 13 UN SDGs 16 (16.3)</i>	Hycroft Board of Directors
Were the policy commitments approved at the most senior level within the organization (GRI 2-23-d) <i>Affiliations: ESRS ESRS 2 GOV-4; MDR-P-65 (c) and (f), G1-1-7; AR 1 (b), S1-1-19 to 21; AR 14, S2-1-16 to 17, 19; AR 16, S3-1-14, 16 to 17; AR 11, S4-1-15 to 17; AR 13 UN SDGs 16 (16.3)</i>	Yes
To what extent the policy commitments apply to the organization's activities and to its business relationships (GRI 2-23-e) <i>Affiliations: ESRS ESRS 2 GOV-4; MDR-P-65 (b) to (c), (f), G1-1-7; AR 1 (b), S1-1-19 to 21; AR 14, S2-1-16 to 17, 19; AR 16, S3-1-14, 16 to 17; AR 11, S4-1-15 to 17; AR 13 UN SDGs 16 (16.3)</i>	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 (GRI 2-23-f) <i>Affiliations: ESRS ESRS 2 GOV-4; MDR-P-65 (f), G1-1-7; AR 1 (b), S1-1-19 to 21; AR 14, S2-1-16 to 17, 19; AR 16, S3-1-14, 16 to 17; AR 11, S4-1-15 to 17; AR 13 UN SDGs 16 (16.3)</i>	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 (GRI 2-24-a)	The most senior level with oversight of, or accountability for, the implementation of the policy commitments.

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 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.) (GRI 2-9-a)

Affiliations: CDSB REQ-01 | ESR5 ESR5 2 GOV-1-21, 22 (a), 23, ESR5 G1-5 (b) | GRI 102-22, 405-1 | IPIECA A1 GOV-1, C1 GOV-1 | WEF-MS C Pillar 1: Principles of Governance - Quality of Governing Body - Governance body composition

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 and people including the oversight of sustainability-related risks and opportunities (e.g. Board level Environment Committee, Safety Committee, ESG Committee, Advisory Committee, etc.) (GRI 2-9-b)

Affiliations: Bloomberg CSR_SUSTAINABILITY_COMMITTEE | CDSB REQ-01 | ESR5 ESR5 2 GOV-1-21, 22 (a), 23, ESR5 G1-5 (b) | GRI 102-22, 405-1 | IFRS-S1 S1.27-a | IPIECA A1 GOV-1, C1 GOV-1 | WEF-MS C Pillar 1: Principles of Governance - Quality of Governing Body - Governance body composition

The Environmental, Social and Governance Committee of the Board of Directors has direct oversight of the majority of the environmental and social impacts.

Describe the composition of the highest governance body and its committees by: (GRI 2-9-c)

Affiliations: CDSB REQ-01 | ESR5 ESR5 2 GOV-1-21, 22 (a), 23, G1-5 (b) | GRI 102-22, 405-1a | IPIECA A1 GOV-1, C1 GOV-1 | UN SDGs 16 (16.7), 5 (5.5) | WDI Section 1: Governance - Direct Operations and Supply Chain | WEF-MS C Pillar 1: Principles of Governance - Quality of Governing Body - Governance body composition

Number of executive members (non-independent)	1
Number of non-executive members (non-independent)	0
Number of independent members	5
The total number of governance body members (GRI 2-9-c-ii)	6
Affiliations: Bloomberg BOARD_SIZE ESR5 ESR5 2 GOV-1-21, 22 (a), 23, G1-5 (b) GRI 102-22, 405-1 SASB EM-MM-510a.1 UN SDGs 16 (16.7), 5 (5.5) WEF-MS C Pillar 1: Principles of Governance - Quality of Governing Body - Governance body composition	
Percentage of independent board members (GRI 2-9-c-ii)	83.3333%
Affiliations: ESR5 ESR5 2 GOV-1-21-e	
Less than 3 years of tenure of members on the governance body	0
3-6 years of tenure of members on the governance body	7
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.
Number of Male governance body members	5
Number of Female governance body members	2
Number of Other 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 detailed director biographies included in the Company's proxy statement.
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 (GRI 2-10-a)

Affiliations: CDSB REQ-01 | GRI 102-24 | IPIECA A1 GOV-1 | UN SDGs 16 (16.7), 5 (5.5) | WDI Section 1: Governance - Direct Operations and Supply Chain | WEF-MSC Pillar 1: Principles of Governance - Quality of Governing Body - Governance body composition

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

[Corporate Governance Guidelines](#)

Does the organization have a diversity policy, gender equality or gender equity plan and if so, provide details, link to the policy or attach the file (ONYEN)

Affiliations: GRI 14.21.5 | IPIECA A1 GOV-1, C1 GOV-1

Yes.

[Diversity and Inclusion Policy](#)

Report the criteria used for nominating and selecting highest governance body members (GRI 2-10-b)

Affiliations: CDSB REQ-01 | GRI 102-24 | IPIECA A1 GOV-1 | UN SDGs 16 (16.7), 5 (5.5) | WDI Section 1: Governance - Direct Operations and Supply Chain | WEF-MSC Pillar 1: Principles of Governance - Quality of Governing Body - Governance body composition

See Corporate Governance Guidelines and Nominating and Governance Committee Charter.

[Corporate Governance Guidelines](#)

[Governance Committee Charter](#)

Are views of stakeholders (including shareholders) taken into consideration for nominating and selecting highest governance body members (GRI 2-10-b-i)

Yes

Discuss how views of the stakeholders (including shareholders) are taken into consideration for nominating and selecting highest governance body members

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 the specific deadline outlined in the latest proxy statement.

Is diversity taken into consideration for nominating and selecting highest governance body members (GRI 2-10-b-ii)

Yes

Discuss how diversity is considered for nominating and selecting highest governance body members

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.

See the Company's Diversity and Inclusion Policy.

[Diversity and Inclusion Policy](#)

Is independence taken into consideration for nominating and selecting highest governance body members (GRI 2-10-b-iii)	Yes
Discuss how independence is considered for nominating and selecting highest governance body members	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 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.
Discuss whether and how competencies relevant to the impacts of the organization are considered (GRI 2-10-b-iv)	The Nominating and Governance Committee (NGC) establishes the annual performance evaluation format, which includes key competencies.
<i>Affiliations: IPIECA A1 GOV-1 WDI Section 1: Governance - Direct Operations and Supply Chain</i>	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.
Chair of the highest governance body	
Is the chair of the highest governance body also a senior executive in the organization (non-independent) (GRI 2-11-a)	No
<i>Affiliations: Bloomberg INDEPENDENT_CHAIRPERSON CDSB REQ-01 GRI 102-22, 405-1 IPIECA A1 GOV-1, C1 GOV-1 UN SDGs 16 (16.6) WDI Section 1: Governance - Direct Operations and Supply Chain WEF-MS Pillar 1: Principles of Governance - Quality of Governing Body - Governance body composition</i>	
Conflicts of Interest	
Describe the processes for the highest governance body to ensure that conflicts of interest are prevented and mitigated (GRI 2-15-a)	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. 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 Spratt Credit Agreement, Spratt Royalty Agreement and 2022 Private placement with American Multi-Cinema, Inc., as well as other material relationships.
Are conflicts of interest disclosed to stakeholders (GRI 2-15-b)	Yes
<i>Affiliations: CDSB REQ-01 GRI 102-25, 405-1 UN SDGs 16 (16.6) WDI Section 1: Governance - Direct Operations and Supply Chain WEF-MS Pillar 1: Principles of Governance - Quality of Governing Body - Governance body composition</i>	

Are there conflicts of interest related to: cross-board membership	No
Are there conflicts of interest related to: cross-shareholding with suppliers and other stakeholders	No
Are there conflicts of interest related to: existence of controlling shareholder	No
Are there conflicts of interest related to: related parties, their relationships, transactions, and outstanding balances	No

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) (GRI 2-17-a)

Affiliations: CDSB REQ-01 | ESRS ESRS 2 GOV-1-23 | GRI 102-27 | IPIECA A1 GOV-1, A6 GOV-1, C1 GOV-1 | WDI Section 1: Governance - Direct Operations and Supply Chain | WEF-MSC Pillar 1: Principles of Governance - Quality of Governing Body - Governance body composition

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 (GRI 2-18-c)

Affiliations: CDSB REQ-01 | GRI 102-28 | IPIECA C1 GOV-1, C5 GOV-1 | WDI Section 1: Governance - Direct Operations and Supply Chain | WEF-MSC Pillar 1 - Principles of Governance - Quality of Governing Body - Governance body composition

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 that benefits shareholders. The Board concluded that its current leadership structure best serves the objectives of Board oversight of management, the Board's ability to carry out its roles and responsibilities on behalf of shareholders, and the Company's overall corporate governance.

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 (GRI 2-12-a)

Affiliations: CDSB REQ-01 | ESRS ESRS 2 GOV-1-22 (c); GOV-2-26 (a) to (b); SBM-2-45 (d), ESRS G1-5 (a) | GRI 102-26 | IPIECA C1 GOV-2 | SASB EM-EP-510a.2 | UN SDGs 16 (16.7) | WDI Section 1: Governance - Direct Operations and Supply Chain | WEF-MSC Pillar 1: Principles of Governance - Governing Purpose - Setting Purpose

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

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 (GRI 2-12-b)

Affiliations: CDSB REQ-01 | ESRS ESRS 2 GOV-1-22 (c); GOV-2-26 (a) to (b); SBM-2-45 (d), G1-5 (a) | GRI 102-22, 405-1 | IPIECA A1 GOV-1, C1 GOV-1 | UN SDGs 16 (16.7) | WDI Section 1: Governance - Direct Operations and Supply Chain | WEF-MSC Pillar 1: Principles of Governance - Risk and Opportunity Oversight - Economic, environmental and social topics in capital allocation framework

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 also directly involved in monitoring management protocols for building a safety culture, hiring and retention practices, training programs and stakeholder engagement.

Does the highest governance body engage with stakeholders to support due diligence and other processes (GRI 2-12-b-i)

Yes

<p>Describe how the highest governance body engages with stakeholders to support these processes (GRI 2-12-b-i)</p> <p><i>Affiliations: CDSB REQ-02 ESRs ESRS 2 GOV-1-22 (c); GOV-2-26 (a) to (b); SBM-2-45 (d), G1-5 (a) GRI 102-21 IPIECA A1 GOV-1, C1 GOV-1, C4 GOV-2 UN SDGs 16 (16.7) WDI Section 1: Governance - Direct Operations and Supply Chain WEF-MSC Pillar 1: Principles of Governance - Risk and Opportunity Oversight - Economic, environmental and social topics in capital allocation framework</i></p>	<p>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.</p>
<p>Describe how the highest governance body considers the outcomes of these processes (GRI 2-12-b-ii)</p> <p><i>Affiliations: ESRS ESRS 2 GOV-1-22 (c); GOV-2-26 (a) to (b); SBM-2-45 (d), G1-5 (a) UN SDGs 16 (16.7) WEF-MSC Pillar 1: Principles of Governance - Risk and Opportunity Oversight - Economic, environmental and social topics in capital allocation framework</i></p>	<p>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.</p>

Ethics

Ethics and Integrity

<p>Describe how individuals can seek advice on implementing the organization's policies and practices for responsible business conduct (GRI 2-26-a-i)</p> <p><i>Affiliations: ESRS G1-1-10 (a); G1-3-18 (a), S1-3-AR 32 (d), S2-3-AR 27 (d), S3-3-AR 24 (d), S4-3-AR 24 (d) GRI 102-17 SASB EM-MM-501a.2, EM-MM-510a.1 UN SDGs 16 (16.3) WEF-MSC Pillar 1 - Principles of Governance - Ethical Behaviour - Protected ethics advice and reporting mechanisms</i></p>	<p>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.</p> <p>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.</p>
<p>Describe the mechanisms for individuals to raise concerns about the organization's business conduct (GRI 2-26-a-ii)</p> <p><i>Affiliations: Bloomberg EMP_PROT_WHISTLE_BLOWER_POLICY ESRS G1-1-10 (a), G1-3-18 (a), S1-3-AR 32 (d), S2-3-AR 27 (d), S3-3-AR 24 (d), S4-3-AR 24 (d) GRI 102-17 SASB EM-MM-501a.2, EM-MM-510a.1 UN SDGs 16 (16.3) WEF-MSC Pillar 1 - Principles of Governance - Ethical Behaviour - Protected ethics advice and reporting mechanisms</i></p>	<p>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.</p>

Compliance with laws and regulations

<p>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 (GRI 2-27-a)</p> <p><i>Affiliations: ESRS E2-4-AR 25 (b), ESRS 2 SMB-3-48 (d), G1-4-24 (a), S1-17-103 (c) to (d) and 104 (b) WEF-MSC Pillar 1: Ethical Behaviour - Monetary losses from unethical behaviour</i></p>	0
Number of instances for which fines were incurred	0
Number of instances for which non-monetary sanctions were incurred	0
<p>Report the total number of fines for instances of non-compliance with laws and regulations that were paid during the reporting period (GRI 2-27-b)</p> <p><i>Affiliations: ESRS E2-4-AR 25 (b), ESRS 2 SMB-3-48 (d), G1-4-24 (a), S1-17-103 (c) to (d) and 104 (b) WEF-MSC Pillar 1: Ethical Behaviour - Monetary losses from unethical behaviour</i></p>	0
<p>Report the monetary value of fines for instances of non-compliance with laws and regulations that were paid during the reporting period (currency, Thousands) (GRI 2-27-b)</p> <p><i>Affiliations: ESRS E2-4-AR 25 (b), ESRS 2 SMB-3-48 (d), G1-4-24 (a), S1-17-103 (c) to (d) and 104 (b) WEF-MSC Pillar 1: Ethical Behaviour - Monetary losses from unethical behaviour</i></p>	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 (currency, Thousands)	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 (currency, Thousands)	0

Describe the significant instances of non-compliance (GRI 2-27-c) <i>Affiliations: ESRS E2-4-AR 25 (b), ESRS 2 SMB-3-48 (d), G1-4-24 (a), S1-17 -103 (c) to (d) and 104 (b)</i>	N/A
Describe the management system and due diligence procedures for assessing and managing corruption and bribery risks internally and associated with business partners in its value chain (SASB EM-MM-510a.1.1) <i>Affiliations: GRI 205-2, 205-3 SASB EM-EP-510a.2 UN SDGs 16 (16.3), 16 (16.5) WEF-MSC Pillar 1: Principles of Governance - Ethical Behaviour -Anti-corruption</i>	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.
If applicable, discuss operations that are located in countries with low rankings in the index but present low business ethics risks; the entity may provide similar discussion for operations located in countries that do not have one of the 20 lowest rankings in the index but that present unique or high business ethics risks (SASB EM-MM-510a.2.4) <i>Affiliations: UN SDGs 16 (16.3), 16 (16.5) WEF-MSC Pillar 1: Principles of Governance - Ethical Behaviour -Anti-corruption</i>	Not applicable.

Anti-Corruption

Corruption Risks to Operations

Describe how potential impacts of corruption or risks of corruption are managed in the organization's procurement practices and throughout the supply chain (GRI 14.22.1)

Hycroft Mining manages corruption risks in its procurement practices and supply chain through a comprehensive compliance framework. The company assesses corruption risks across 100% of its operations and has implemented the NAVEX One EthicsPoint whistleblowing and incident management system, which allows employees to report suspected violations confidentially and anonymously. All directors, officers, employees, consultants, and contractors are required to comply with the company's Anti-Bribery and Anti-Corruption Policy and the Code of Business Conduct and Ethics, with annual certification mandatory. Suppliers and contractors are selected in a non-discriminatory manner based on quality, cost, and service, with decisions never based on personal interests. The Chief Financial Officer oversees policy implementation and compliance monitoring, with direct reporting obligations to the audit committee. The company conducts periodic reviews and testing of its compliance procedures and maintains robust internal controls to detect and prevent improper payments or corrupt practices throughout its supply chain. No significant corruption risks have been identified in current operations.

Total number of operations assessed for corruption risks (GRI 205-1-a-iii) <i>Affiliations: ESRS G1-3-AR 5 GRI 13.26.2, 14.22.2 SASB EM-MM-510a.1 UN SDGs 16 (16.5) WEF- MSC Pillar 1 - Principles of Governance - Ethical Behaviour - Anti-Corruption</i>	1
Percentage of operations assessed for corruption risks (GRI 205-1-a-iii) <i>Affiliations: ESRS G1-3-AR 6 GRI 13.26.2, 14.22.3 SASB EM-MM-510a.2 UN SDGs 16 (16.5) WEF- MSC Pillar 1 - Principles of Governance - Ethical Behaviour - Anti-Corruption</i>	100.0000%
Has the company identified any significant corruption risks (GRI 205-1-b) <i>Affiliations: ESRS G1-3-AR 8 GRI 13.26.2, 14.22.5 SASB EM-MM-510a.1 UN SDGs 16 (16.5) WEF- MSC Pillar 1: Principles of Governance - Ethical Behaviour - Anti-Corruption</i>	No

Confirmed Incidents and Response

Total number and nature of confirmed incidents of corruption (GRI 205-3-a)

0

Affiliations: ESRS G1-4-25 (a) | GRI 13.26.4, 14.22.4 | SASB EM-MM-510a.1 | UN SDGs 16 (16.5) | WEF- MSC Pillar 1 - Principles of Governance - Ethical Behaviour - Anti-Corruption

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
Total number of confirmed incidents in which employees were dismissed or disciplined for corruption (GRI 205-3-a-xi) <i>Affiliations: ESRS G1-4-24 (b), G1-4-25 (b) GRI 13.26.4, 14.22.15 UN SDGs 16 (16.5) WEF-MSC Pillar 1: Principles of Governance - Ethical Behaviour - Anti-Corruption</i>	0
Total number of contracts terminated or not renewed with business partners due to corruption related violations (GRI 205-3-b) <i>Affiliations: ESRS G1-4-24 (b), G1-4-25 (c) GRI 13.26.4, 14.22.16 UN SDGs 16 (16.5) WEF-MSC Pillar 1: Principles of Governance - Ethical Behaviour - Anti-Corruption</i>	0
Number of public legal cases brought against the organization or its employees during the reporting period related to corruption and the outcomes of such cases (GRI 205-3-c) <i>Affiliations: ESRS G1-4-24 (b), G1-4-25 (b) GRI 13.26.4, 14.22.17 UN SDGs 16 (16.5) WEF-MSC Pillar 1: Principles of Governance - Ethical Behaviour - Anti-Corruption</i>	0
Contracts and Owners Transparency	
Are company's contracts and licenses made publicly available (GRI 14.22.5)	Yes
If contracts are public, where are they published	All business licenses and permits are public record.
If contracts or licenses are not publicly available, the reason for this and actions taken to make them public in the future (GRI 14.22.5)	Not applicable.
Name, nationality, and country of residence of the organization's beneficial owners, including joint ventures (GRI 14.22.6)	Beneficial ownership interests in Hycroft are reported to the U.S. Securities and Exchange Commission (SEC) pursuant to U.S. law is available at on the SEC's website.
Are the beneficial owners politically exposed persons (GRI 14.22.6)	No
Level of ownership (GRI 14.22.6)	Hycroft Mining Holding Corporation maintains a minimum share ownership policy requiring senior executive officers and non-executive directors to hold specified levels of company shares. Once target ownership levels are attained, executives and directors may sell shares in accordance with the Company's Insider Trading Policy, provided their holdings remain at or above the established ownership targets. The Board reviews this policy annually to ensure its effectiveness in mitigating governance risks.
How is ownership or control exerted (GRI 14.22.6)	Hycroft Mining Holding Corporation is a public company listed on the Nasdaq Stock Market.
Communication and Training	
Total number of governance body members that the organization's anti-corruption policies and procedures have been communicated to (GRI 205-2-a - i (2016)) <i>Affiliations: ESRS G1-3-20, 21 (b) and (c) and AR-7 and 8 GRI 13.26.3, 14.22.38 SASB EM-MM-510a.1 UN SDGs 16 (16.5) WEF-MSC Pillar 1: Principles of Governance - Ethical Behaviour - Anti-Corruption</i>	6
Total percentage of governance body members that have been communicated to on anti-corruption (GRI 205-2-a - ii (2016)) <i>Affiliations: ESRS G1-3-20, 21 (b) and (c) and AR-7 and 8 GRI 13.26.3, 14.22.37 SASB EM-MM-510a.1 UN SDGs 16 (16.5) WEF-MSC Pillar 1: Principles of Governance - Ethical Behaviour - Anti-Corruption</i>	100.0000%
Anti-corruption policies and procedures communication to direct employees by type: (GRI 205-2-b (2016)) <i>Affiliations: ESRS G1-3-20, 21 (b) and (c) and AR-7 and 8 GRI 13.26.3, 14.22.35 SASB EM-MM-510a.1 UN SDGs 16 (16.5) WEF-MSC Pillar 1: Principles of Governance - Ethical Behaviour - Anti-Corruption</i>	
Total number of the direct employees that have been communicated to on anti-corruption	51
Total percentage of the direct employees that have been communicated to on anti-corruption	100.0000%
Total number of senior management employees that have been communicated to on anti-corruption	8
Percentage of senior management employees that have been communicated to on anti-corruption	100.0000%

Total number of middle management employees that have been communicated to on anti-corruption	17
Percentage of middle management employees that have been communicated to on anti-corruption	100.0000%
Total number of salaried employees that have been communicated to on anti-corruption	12
Percentage of salaried employees that have been communicated to on anti-corruption	100.0000%
Total number of technical employees that have been communicated to on anti-corruption	4
Percentage of technical employees that have been communicated to on anti-corruption	100.0000%
Total number of administrative employees that have been communicated to on anti-corruption	20
Percentage of administrative employees that have been communicated to on anti-corruption	100.0000%
Total number of all other categories of direct employees that have been communicated to on anti-corruption	0
Percentage of all other categories of direct employees that have been communicated to on anti-corruption	Does Not Apply
Total number of governance body members that have received training on anti-corruption (GRI 205-2-d-i (2016))	7
<i>Affiliations: ESRS G1-3-20, 21 (b) and (c) and AR-7 and 8 GRI 13.26.3, 14.22.3, 405-1 SASB EM-MM-510a.1 UN SDGs 16 (16.5) WEF-MSC Pillar 1: Principles of Governance - Ethical Behaviour - Anti-Corruption</i>	
Total percentage of governance body members that have received training on anti-corruption, broken down by region	100.0000%
Total number and percentage of direct employees that has received training on anti-corruption, broken down by employee category and region (GRI 205-2-e (2016))	
<i>Affiliations: ESRS AR-7 and 8, G1-3-20, 21 (b) and (c) GRI 13.26.3, 14.22.3, 405-1 SASB EM-MM-510a.1 UN SDGs 16 (16.5) WEF-MSC Pillar 1: Principles of Governance - Ethical Behaviour - Anti-Corruption</i>	
Total number of direct employees that received training on anti-corruption	51
Total number of direct employees	51
Total percentage of direct employees that received training on anti-corruption	100.0000%
Percentage of senior management employees who received training on anti-corruption	100.0000%
Total number of salaried employees who received training on anti-corruption	12
Percentage of salaried employees who received training on anti-corruption	100.0000%
Percentage of technical employees who received training on anti-corruption	100.0000%
Total number of production employees who received training on anti-corruption	28
Percentage of production employees who received training on anti-corruption	100.0000%

Security Practices

Policy and Procedure Training

Describe how the organization seeks to prevent or mitigate potential negative impacts from the use of public and private security providers (GRI 14.14.1)

Hycroft has established security protocols and procedures to ensure that all security personnel, whether public or private, operate in accordance with the company's commitment to human rights and ethical business practices.

Has the organization implemented the Voluntary Principles on Security and Human Rights (GRI 14.14.1)

Yes

Risk Management

Disclose the processes and related policies the entity uses to identify, assess, prioritise and monitor sustainability-related risks (IFRS-S1 S1.44-a)

Affiliations: CSDS 1.44-a | ESRS ESRS 2 GOV-5-36 (a) to (e)

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. False
Entity uses scenario analysis to inform identification of risks	False
How the scenario analysis is used to inform identification of risk	No
The entity changed the processes it currently uses compared with the previous reporting period	False
<p>Disclose the extent to which, and how, the processes for identifying, assessing, prioritising and monitoring sustainability-related risks and opportunities are integrated into and inform the entity's overall risk management process (IFRS-S1 S1.44-c)</p> <p><i>Affiliations: CSDS 1.44-c ESRS ESRS 2 GOV-5-36 (a) to (e)</i></p>	<p>Sustainability-related risk processes are managed as part of the company's broader operational and compliance systems. These include:</p> <ul style="list-style-type: none"> Compliance with federal and state regulations Internal policies and standards related to environmental protection, safety, and ethics Transparent communication and reporting on incidents and hazards Training and engagement programs for employees and contractors
<p>Describe the role of the highest governance body in reviewing the effectiveness of the organization's processes to manage and identify impacts on economy, environment and people (GRI 2-12-c)</p> <p><i>Affiliations: CDSB REQ-01 ESRS ESRS 2 GOV-1-22 (c); GOV-2-26 (a) to (b); SBM-2-45 (d), ESRS 2 GOV-5-36 (e), G1-5 (a) GRI 102-28 IPIECA C3 GOV-1, C4 GOV-2 UN SDGs 16 (16.7) WDI Section 1: Governance - Direct Operations and Supply Chain</i></p>	The Board of Directors, through the Sustainability Committee, holds ultimate oversight of sustainability governance. The Committee is responsible for reviewing the effectiveness of the underlying processes for managing sustainability-related impacts and recommends updates to the Board.
Frequency of review by the highest governance body in reviewing effectiveness of the organization's processes (GRI 2-12-c)	Quarterly
Highest Review Position	
<p>Is the highest governance body responsible for reviewing and approving the reported information, including the organization's material topics (GRI 2-14-a)</p> <p><i>Affiliations: CDSB REQ-01 ESRS ESRS 2 GOV-1-22 AR 3 (a) ii and iv, ESRS 2 GOV-5-36, ESRS 2 GOV-5-36 (a) to (e), IRO-1-53 (d) GRI 102-28, 102-32 IPIECA C3 GOV-1</i></p>	Yes
<p>Describe the process for reviewing and approving the reported information (GRI 2-14-a)</p> <p><i>Affiliations: CDSB REQ-01 ESRS ESRS 2 GOV-1-22 AR 3 (a) ii and iv, ESRS 2 GOV-5-36, ESRS 2 GOV-5-36 (a) to (e), IRO-1-53 (d) GRI 102-28, 102-32 IPIECA C3 GOV-1 WDI Section 1: Governance - Direct Operations and Supply Chain</i></p>	Quarterly Board and Committee meetings.
<p>If the highest governance body is not responsible for reviewing and approving the reported information, including the organization's material topics, explain the reason for this (GRI 2-14-b)</p> <p><i>Affiliations: CDSB REQ-01 ESRS ESRS 2 GOV-1-22 AR 3 (a) ii and iv, ESRS 2 GOV-5-36, ESRS 2 GOV-5-36 (a) to (e), IRO-1-53 (d) GRI 102-28, 102-32 IPIECA C3 GOV-1 WDI Section 1: Governance - Direct Operations and Supply Chain</i></p>	Not applicable.
Communication of critical concerns	
<p>Are critical concerns communicated to the highest governance body (GRI 2-16-a)</p> <p><i>Affiliations: CDSB REQ-01 ESRS ESRS 2 GOV-2-26 (a), ESRS G1 G1-1 AR 1 (a), G1-3-18 (c) GRI 102-33 IPIECA C3 GOV-1</i></p>	Yes
<p>Describe how critical concerns are communicated to the highest governance body (GRI 2-16-a)</p> <p><i>Affiliations: CDSB REQ-01 ESRS ESRS 2 GOV-2-26 (a), ESRS G1 G1-1 AR 1 (a), G1-3-18 (c) GRI 102-33 IPIECA C3 GOV-1 WDI Section 1: Governance - Direct Operations and Supply Chain</i></p>	Through quarterly Board and Committee meetings.
<p>Report the number of critical concerns that were communicated to the highest governance body during the reporting period (GRI 2-16-b)</p> <p><i>Affiliations: CDSB REQ-01 ESRS ESRS 2 GOV-2-26 (a), ESRS G1 G1-1 AR 1 (a), G1-3-18 (c) GRI 102-33 WDI Section 1: Governance - Direct Operations and Supply Chain</i></p>	0
Remuneration	
<p>Report which of the following remuneration policies apply to the highest governance body and senior executives and provide details: (GRI 2-19-a)</p> <p><i>Affiliations: CDSB REQ-01 ESRS ESRS 2 GOV-3-29 (a) to (c), ESRS E1-13 GRI 102-35 WDI Section 1: Governance - Direct Operations and Supply Chain WEF-MSc Pillar 1: (Expanded metrics) - Principles of Governance - Quality of Governing Body - Remuneration</i></p>	See below.
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 (GRI 2-19-b) <i>Affiliations: Bloomberg ESG_LINKED_BONUS, ESG_LINKED_COMPENSATION_FOR_BRD CDSB REQ-01 ESRS E1-13, ESRS 2 GOV-3 -29 (a) to (c) GRI 102-36 IPIECA C5 GOV-1 WDI Section 1: Governance - Direct Operations and Supply Chain WEF-MSC Pillar 1: (Expanded metrics) - Principles of Governance - Quality of Governing Body - Remuneration</i>	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 (IFRS-S2 S2.29-g-i) <i>Affiliations: CDP C1.3 CDSB REQ-01, REQ-02, REQ-03, REQ-05, REQ-06 CSDS S2.29-g-i TCFD Metrics and Targets WEF-MSC Pillar 1: (Expanded Metrics & Disclosures) - Principles of Governance - Quality of Governing Body - Remuneration</i>	Not Applicable
Climate-related performance metrics are included in remuneration policies	No
Describe the process for determining remuneration (GRI 2-20-a) <i>Affiliations: ESRS ESRS 2 GOV-3-29 (e) GRI 102-36 WDI Section 1: Governance - Direct Operations and Supply Chain, Section 5: Workforce Wage Levels and Pay Gaps- Direct Operations Section 12: Responsible Sourcing - Supply Chain WEF-MSC Pillar 1: (Expanded metrics) - Principles of Governance - Quality of Governing Body - Remuneration</i>	The Compensation Committee has implemented compensation policies and philosophies that link a 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 (GRI 2-20-a-ii) <i>Affiliations: Bloomberg SAY_ON_PAY_PROVISION CDSB REQ-01 ESRS ESRS 2 GOV-3-29 (e) GRI 102-37 IPIECA C5 GOV-1 WDI Section 12: Responsible Sourcing - Supply Chain WEF-MSC Pillar 1: (Expanded metrics) - Principles of Governance - Quality of Governing Body - Remuneration</i>	Through our independent compensation consultant's analysis and through shareholder votes related to executive compensation.
Are remuneration consultants involved in determining remuneration (GRI 2-20-a-iii) <i>Affiliations: ESRS ESRS 2 GOV-3-29 (e) WDI Section 1: Governance - Direct Operations and Supply Chain, Section 5: Workforce Wage Levels and Pay Gaps- Direct Operations Section 12: Responsible Sourcing - Supply Chain WEF-MSC Pillar 1: (Expanded metrics) - Principles of Governance - Quality of Governing Body - Remuneration</i>	Yes
Are remuneration consultants independent of the organization, the highest governance body and senior executives (GRI 2-20-a-iii) <i>Affiliations: ESRS ESRS 2 GOV-3-29 (e) WDI Section 1: Governance - Direct Operations and Supply Chain, Section 5: Workforce Wage Levels and Pay Gaps- Direct Operations Section 12: Responsible Sourcing - Supply Chain WEF-MSC Pillar 1: (Expanded metrics) - Principles of Governance - Quality of Governing Body - Remuneration</i>	Yes
Report the results of votes of stakeholders (including shareholders) on remuneration policies and proposals, if applicable (GRI 2-20-b) <i>Affiliations: CDSB REQ-01 ESRS ESRS 2 GOV-3-29 (e) IPIECA C5 GOV-1 WDI Section 12: Responsible Sourcing - Supply Chain WEF-MSC Pillar 1: (Expanded metrics) - Principles of Governance - Quality of Governing Body - Remuneration</i>	In 2024, Hycroft's shareholders, in a non-binding, advisory vote, approved approved the compensation of our named executive officers.
Stakeholder Engagement	
Describe the organization's approach to stakeholder engagement, including frequency of engagement by type (GRI 2-29-a) <i>Affiliations: CDSB REQ-03 Risks and Opportunities ESRS ESRS 2 SMB-2-45 (a) i to (a) iv, S1-1-20 (b), S1-2-25, 27 (e) and 28, S2-1-17 (b), S2-2-20, 22 (e) and 23, S3-1-16 (b); S3-2-19, 21 (d) and 22, S4-1-16 (b); S4-2-18, 20 (d) and 21 GRI 102-40 IPIECA A4 GOV-1, A4 GOV-2, C4 GOV-2 SASB EM-EP-510a.2 WDI Section 11: Supply Chain Transparency - Supply Chain WEF-MSC Pillar 1: Principles of Governance - Stakeholder engagement - Material issues impacting stakeholders</i>	See below.
Provide a list of stakeholder groups engaged by the organization (GRI 2-29-a)	<ul style="list-style-type: none"> • Permanent or Full-time Employees • Investors

<p>Affiliations: CDSB REQ-03 Risks and Opportunities ESRS ESRS 2 SMB-2-45 (a) i to (a) iv, S1-1-20 (b), S1-2-25, 27 (e) and 28, S2-1-17 (b), S2-2-20, 22 (e) and 23, S3-1-16 (b); S3-2-19, 21 (d) and 22, S4-1-16 (b); S4-2-18, 20 (d) and 18 GRI 102-40 IPIECA A4 GOV-1, A4 GOV-2 SASB EM-EP-510a.2 WDI Section 11: Supply Chain Transparency - Supply Chain WEF-MSC Pillar 1: Principles of Governance - Stakeholder engagement - Material issues impacting stakeholders</p>	<ul style="list-style-type: none"> • Local communities • Local government bodies • Regulatory authorities • Suppliers and contractors • Consultants (professional services)
<p>Report the basis for identifying and selecting stakeholders with whom to engage (GRI 2-29-a-i)</p> <p>Affiliations: CDSB REQ-03 Risks and Opportunities ESRS ESRS 2 SMB-2-45 (a) i to (a) iv, S1-1-20 (b), S1-2-25, 27 (e) and 28, S2-1-17 (b), S2-2-20, 22 (e) and 23, S3-1-16 (b); S3-2-19, 21 (d) and 22, S4-1-16 (b); S4-2-18, 20 (d) and 19 GRI 102-40 WDI Section 11: Supply Chain Transparency - Supply Chain WEF-MSC Pillar 1: Principles of Governance - Stakeholder engagement - Material issues impacting stakeholders</p>	<p>Identifying and selecting stakeholders with whom to engage is a crucial step in project management, strategic planning, and organizational decision-making. The process ensures that the right people or groups are involved in decision-making, communication, and execution, leading to better project outcomes and greater alignment with organizational goals.</p>
<p>Report the purpose of the stakeholder engagement (GRI 2-29-a-ii)</p> <p>Affiliations: CDSB REQ-03 Risks and Opportunities ESRS ESRS 2 SMB-2-45 (a) i to (a) iv, S1-1-20 (b), S1-2-25, 27 (e) and 28, S2-1-17 (b), S2-2-20, 22 (e) and 23, S3-1-16 (b); S3-2-19, 21 (d) and 22, S4-1-16 (b); S4-2-18, 20 (d) and 20 GRI 102-40 WEF-MSC Pillar 1: Principles of Governance - Stakeholder engagement - Material issues impacting stakeholders</p>	<p>Hycroft's primary focus for stakeholder engagement is to ensure that we regularly communicate with all stakeholders including our local community, shareholders, and others impacted by the Hycroft and its projects. We strive to maintain strong relationships and address any concerns or issues that might arise through in-person meetings, regularly scheduled meetings with shareholders, our whistleblower policy, and the publication of information on our website.</p>
<p>Describe how the organization seeks to ensure meaningful engagement with stakeholders (GRI 2-29-a-iii)</p> <p>Affiliations: CDSB REQ-03 Risks and Opportunities ESRS ESRS 2 SMB-2-45 (a) i to (a) iv, S1-1-20 (b), S1-2-25, 27 (e) and 28, S2-1-17 (b), S2-2-20, 22 (e) and 23, S3-1-16 (b); S3-2-19, 21 (d) and 22, S4-1-16 (b); S4-2-18, 20 (d) and 20 GRI 102-40</p>	<p>Hycroft issues frequent press releases announcing quarterly results, drill results, and other important information, timely files all required reports with the U.S. Securities and Exchange Commission, engages in widely broadcasted webinars, regularly updates its website, and holds an annual shareholder meeting.</p>
<p>Tax</p>	
<p>Describe the approach to stakeholder engagement and management of stakeholder concerns related to tax (GRI 207-3-a)</p> <p>Affiliations: GRI 14.23.6 IPIECA A4 GOV-2 UN SDGs 1 (1.1), 1 (1.3), 10 (10.4), 17 (17.1), 17 (17.3) WEF-MSC Pillar 1: Principles of Governance - Stakeholder engagement - Material issues impacting stakeholders</p>	<p>See below.</p>
<p>The approach to engagement with tax authorities</p>	<p>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 2024, Hycroft continued to build 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.</p>
<p>The approach to public policy advocacy on tax</p>	<p>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.</p>
<p>The processes for collecting and considering the views and concerns of stakeholders, including external stakeholders</p>	<p>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.</p>

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