

INV METALS INC.

Community Complaints Procedure

Purpose

1. INV Metals Inc. and its subsidiaries (together “**INV Metals**” and the “**Company**”) are committed to treating the members of the communities in which we operate with fairness and respect and it is our goal to maintain the trust and confidence of the community.
2. The purpose of this procedure is to:
 - (a) document, investigate and resolve community concerns promptly and effectively;
 - (b) provide members of the community with an effective and efficient means of reporting concerns related to our activities and operations;
 - (c) provide a clear procedure for dealing with concerns;
 - (d) communicate effectively throughout the complaints procedure with a community member reporting a concern; and
 - (e) monitor complaints about our activities.

Scope

3. The procedure applies to all:
 - (a) jurisdictions in which we carry on business and in all affected communities; affected communities are communities where we carry out operations or that may be impacted by our operations in some way;
 - (b) members of affected communities or anyone acting on their behalf;
 - (c) complaints related to the impact of the Company’s activities and operations on members of affected communities.

Responsibilities

4. Overall authority for this procedure sits with the Chief Financial Officer.
5. Officers of the Company or a subsidiary of the Company have primary responsibility to promote the effective implementation and application of this procedure and to:
 - (a) ensure that anyone working for or on behalf of the Company on any project or activity understands the importance of respecting the concerns of affected communities;
 - (b) communicate this procedure to affected communities in their area of operations; communication should be in the local language and appropriate to the social and cultural context of the operating area; and

- (c) ensure anyone working for or on behalf of the Company or any member of the affected communities feels able to raise concerns without fear of reprisals.
6. Anyone working for or acting on behalf of the Company on a project or activity is responsible for reporting any complaints they may receive from members of affected communities to the appropriate individuals.

How to Report a Complaint

Reporting Methods

7. Any member of an affected community may raise a concern by phone, by email, in writing or in person to the following person in the areas noted below:
- (a) in Canada, Barbados, Brazil and Namibia – Sunny Lowe at 1-416-703-8416 or slowe@invmetals.com;
 - (b) in the case of a complaint regarding Ecuador, the Manager of Community Relations, Ecuador, Fernando Carrion, at 011-593-02-246-8674 or fcarrion@invmetals.com.ec;
 - (c) send an e-mail to info@invmetals.com;
 - (d) or call the hotline in Canada at 1-416-703-8416 or 1-877-700-8416, or in Ecuador at 011-593-02-246-8674.
8. Any member of an affected community that has a complaint but is not comfortable raising the matter personally with a Company representative can appoint someone the complainant trusts to raise the concern on the complainant's behalf.

Confidentiality

9. If requested by the complainant, the Company will, if appropriate, endeavour to keep the complainant's identity confidential. In some cases, the complainant may be asked to keep the complaint confidential.
10. There may be circumstances in which, because of the nature of the investigation or disclosure, it will be necessary to disclose the identity of the complainant.

How Complaints Are Handled

11. The Company representative receiving the complaint shall complete a Community Complaints Report (see Appendix 1) noting: the time and date of complaint; name, address and contact number (if possible) of the complainant; the means of communication; and the nature of the complaint.
12. The complaint will be forwarded to the appropriate Company representative depending on the nature and location of the complaint.

13. The Chief Financial Officer shall be informed of community concerns of a significant nature by the Company representative who became aware of the complaint. Examples of a significant concern can include:
 - (a) allegations of corruption or fraud;
 - (b) violations of local laws;
 - (c) infringement of human rights;
 - (d) damage to property, environmental or cultural resources; and
 - (e) injury to members of the community.
14. The Company will assign a Complaints Manager who will investigate the concern and communicate with the complainant.
15. An initial assessment will be conducted to determine whether an investigation is appropriate and, if deemed necessary, the scope and form of investigation that should take place.
16. The primary goal of the investigation will be to ascertain the facts underlying the complaint and recommend a course of action, if deemed appropriate.
17. The complainant may be asked to provide more information during the course of an investigation.
18. The Complaints Manager is responsible for recording details of the complaint and the actions taken by the complainant and the Company in the Community Complaints Report.
19. Where an investigation identifies wrongdoing by Company personnel or anyone acting on behalf of the Company, action will be taken as deemed appropriate by the Company.

Communications with the Complainant

20. The Company will acknowledge the receipt of a complaint and will respond to the complainant if deemed appropriate by the Company.
21. When the Company has completed its assessment of the complaint, the Complaints Manager may contact the complainant to relay the Company's assessment if deemed appropriate. The Complaints Manager will attempt to provide information that is factual, unbiased and, wherever possible, scientifically based, in an effort to address the concerns to the satisfaction of the complainant.
22. In cases where the complainant continues to be dissatisfied, the complainant will be informed of their right to refer the complaint to the attention of the Chief Financial Officer.

Monitoring and Reviewing

23. The Company will maintain a register of complaints received, the results of investigations and the actions taken to address complaints.
24. The register will be reviewed quarterly at the operations level and annually across the organization.

Effective: February 23, 2016

Appendix 1 - Community Complaints Report

Date of complaint:

Time of complaint:

Name of complainant:

Contact number:

Address of complainant:

Type of communication of complaint:

Nature of the complaint:

Assessment of the complaint: