



WORKPLACE DISCRIMINATION, HARASSMENT AND VIOLENCE POLICY

1. INTRODUCTION

- 1.1. Lundin Gold is committed to responsible mining, which includes providing and maintaining a safe and healthy workplace that is free from discrimination, harassment and violence.
- 1.2. According to the laws where Lundin Gold carries on business (collectively, the **Regulations**) every employee has the right to freedom from discrimination, harassment and violence in the workplace. Lundin Gold fully supports and adheres to the principles and practices set out in the Regulations and is committed to the proper treatment of employees and to providing a procedure for employees to report incidents of discrimination, harassment and violence in the workplace.

2. APPLICATION OF THIS POLICY

- 2.1. This Policy applies to all current employees of Lundin Gold, including its subsidiaries, and their respective full and part-time, permanent and temporary employees and to all of Lundin Gold's agents, contractors and suppliers. In this Policy, the term **employees** includes Lundin Gold's agents, contractors and suppliers and their employees.
- 2.2. This Policy applies to all behaviour that is connected to Lundin Gold work, including during off-site meetings, social functions, training and on business trips. Discrimination, harassment or violence which occurs outside the workplace or outside regular business hours, but which has repercussions in the workplace, may also be a violation of this Policy. This includes communications by e-mail or text message or social media, whether or not such communications are made using Lundin Gold's information technology system.

3. DEFINITIONS

- 3.1 **Discrimination** means any distinction, exclusion, preference or differential treatment based on **Prohibited Grounds**, without a valid work-related justification or legal requirement, that nullifies or impairs equality for opportunities in employment or equality in the terms and conditions of employment.

Prohibited Grounds include race, colour, gender or gender identification, pregnancy or child-birth, sex, sexual orientation, marital or family status, age, religious, ideological or political conviction, language, ethnic or national origin, aesthetic stereotypes, having HIV/AIDS or another disease or physical or mental disability or other protected grounds under the Regulations.

3.2 **Harassment** means:

- (a) improper and unwanted comment or conduct against an employee that is known or ought reasonably to be known or might reasonably be expected to threaten the dignity or cause insecurity, offense, discomfort, humiliation or intimidation of another employee; or
- (b) any inappropriate conduct, comment, display, action or gesture or other behaviour that adversely affects an employee's dignity, psychological or physical well-being and that results in a harmful work environment for the employee; or
- (c) disregard of an employee's right to disconnect from work, including disregard of an employee's right to rest periods, leave, and vacations, as well as violations of their privacy; or
- (d) **workplace sexual harassment**, which means:
 - i. engaging in a course of conduct, comment, display, action or gesture against an employee because of sex, sexual orientation, gender or gender identity, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome, or
 - ii. making a sexual solicitation or advance where the person making the solicitation or advance is in a position to confer, grant or deny a benefit or advancement to the employee and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

3.3 **Right to disconnect** means an employee's right to disengage from work and refrain from responding to work-related communications, such as emails, calls, or messages, outside of their regular working hours.

3.4 Harassment must involve either repeated occurrences or a single, serious occurrence that has reasonably been established to have caused a lasting harmful effect on an employee.

3.5 Reasonable actions or conduct by management that is part of the running of the business and carried out in a respectful manner is not harassment. This is the case even if there are unpleasant consequences for an employee, such as disciplinary action, negative performance reviews or changes in work assignments. Differences of opinion or disagreements between employees about work matters will similarly not be considered workplace harassment.

3.6 The right to disconnect does not apply to senior or management level employees¹, nor in situations of force majeure or other urgent circumstances requiring immediate attention to ensure business continuity. In such cases, reasonable contact with an employee will not be considered harassment pursuant to section 3.2(c) under this Policy.

¹ For the purposes of this Policy, senior or management level employees means superintendent level and above.

- 3.7 **Workplace violence** means the exercise of physical force or attempt to use physical force by a person against an employee. It also includes a statement or behaviour that it is reasonable for an employee to interpret as a threat to exercise physical force against the employee.

4. LUNDIN GOLD'S EXPECTATIONS

- 4.1 All employees are expected to conduct themselves in a manner consistent with this Policy. This means that all employees must refrain from causing or participating in the discrimination or harassment of or violence against another person in the workplace.
- 4.2 All employees have a responsibility to ensure fellow employees are treated with dignity and respect within a safe work environment. Any employee who observes behaviour contrary to this Policy is encouraged to report the incident using the Complaint Procedure in this Policy.
- 4.3 All employees must cooperate with an investigation and respect the confidentiality of the investigation process.

5. COMPLAINT PROCEDURE

- 5.1 An employee who believes that he or she has been subjected to or has observed conduct contrary to this Policy is requested to immediately report the incident to Lundin Gold by completing an incident report using the form attached to this Policy, which should at least include the nature of the allegations; the names of the persons involved; the relationship of the persons involved (e.g., supervisor, colleague); the date and a detailed description of the incident(s); and, if applicable, the names of witnesses. The complainant must provide sufficient information and be as precise and concise as possible to allow investigation of the matter.

Once the report is completed it should be submitted by sending a confidential email, with the report attached, to DenunciaDeAcoso@lundingold.com, which will be received by Lundin Gold's Vice President, Legal.

Alternatively, reports may be made pursuant to Lundin Gold's *Whistleblower Policy* or through Lundin Gold's Whistleblower website at:

www.integritycounts.ca/org/lundingold

- 5.2 If the complaint is incomplete following requests for clarification, an investigation will not be initiated, and the complainant will be so notified.
- 5.3 This Policy does not affect the rights of employees to pursue complaints under applicable laws of the appropriate jurisdiction.
- 5.4 Confidentiality will be maintained throughout the complaint, investigatory and disciplinary processes, in order to protect the interests of the complainant and the accused to the extent legally and practically possible. However, disclosure of information collected in the course of an investigation may be necessary for a proper investigation and resolution of the matter or otherwise required by law; in these cases, confidentiality cannot be guaranteed.

- 5.5 Investigations will be conducted in a timely and impartial manner, will be documented, and will be focused on finding facts and evidence, including interviews of the complainant, accused, any witnesses or other persons known to be directly involved or who may have relevant information about the issues being investigated. Employees must cooperate fully in any investigation. Results of an investigation will be communicated to both the complainant and accused as soon as possible after the investigation has been completed.
- 5.6 Based upon results of the investigation, action and/or disciplinary measures which management concludes is appropriate (up to and including termination of employment) will be taken immediately.
- 5.7 Retaliation or reprisals are prohibited against any individual who has complained under this Policy or has provided information regarding a complaint. Any retaliation or reprisals are subject to immediate action, up to and including termination of employment. Alleged retaliation or reprisals are subject to the same complaint procedures and penalties as complaints of discrimination, harassment, or violence and must be made within two years of the resolution of the initial complaint.
- 5.8 The Company may take action against those who submit false or deliberately inaccurate complaints or information under this Policy.
- 5.9 Records of complaints and investigations will be retained in accordance with the Company's policies and procedures.

6. DISTRIBUTION AND TRAINING

- 6.1 This Policy will be distributed to all employees on an annual basis and whenever changes are made. New employees will be provided with a copy of this Policy and advised of its importance.
- 6.2 Lundin Gold shall conduct a suitable training program for employees on the requirements of this Policy and will maintain records documenting the date and content of the training and the names of those trained.
- 6.3 If an employee has questions or concerns regarding this Policy, he or she should contact any member of Human Resources or the Vice President, Legal.
- 6.4 On a quarterly basis Lundin Gold shall report complaints of discrimination, violence, and workplace harassment to the Health, Safety, Environment and Sustainability Committee of its Board of Directors.

7. REVIEW

- 7.1 The Vice President, Legal & Sustainability will review this Policy on an annual basis, or as required, and will recommend modifications to the Board of Directors, as needed. Recommended modifications will take into account changes to law, evaluation of the efficacy of this Policy and other factors.

INCIDENT FORM

CONFIDENTIAL

Instructions for completing this form: This form is intended for the use of employees to report complaints and/or incidents they believe violate *the Workplace Discrimination, Harassment and Violence Policy*. Please ensure that you fill out every section of the form accurately, attach any supporting documentation you may have and ensure that it has been signed and dated. If you are unable to attach relevant supporting documentation, please attach a list detailing the documentation and persons who may be in possession of it. Upon completion of the form, please submit it in accordance with section 5.1 of the Policy immediately.

In completing the form below, please provide as much information about the names of the persons involved; the relationship of the persons involved (e.g., supervisor, colleague); the date and a detailed description of the incident(s); and, if applicable, the names of witnesses.

Employee (Complainant) Information

First Name	Last Name
Telephone Number	Alternative Telephone Number
Email	Work Location

Details of Person(s) Involved in the Complaint. Attach additional pages if necessary.

Person 1		
First Name		Last Name
Telephone Number	Alternative Telephone Number	Work Email
<input type="checkbox"/> Respondent (alleged to have engaged in wrongdoing)		
<input type="checkbox"/> Witness		
<input type="checkbox"/> Other: _____		
Person 2		
First Name		Last Name
Telephone Number	Alternative Telephone Number	Work Email
<input type="checkbox"/> Respondent (alleged to have engaged in wrongdoing)		
<input type="checkbox"/> Witness		
<input type="checkbox"/> Other: _____		

Details of Person(s) Involved in the Complaint (Continued)

Person 3

First Name		Last Name
Telephone Number	Alternative Telephone Number	Work Email

- ☐ Respondent (alleged to have engaged in wrongdoing)
- ☐ Witness
- ☐ Other: _____

Person 4

First Name		Last Name
Telephone Number	Alternative Telephone Number	Work Email

- ☐ Respondent (alleged to have engaged in wrongdoing)
- ☐ Witness
- ☐ Other: _____

Complaint Details.

Include dates, times and details of specific behaviour and/or words used. Attach additional pages if necessary.

[illegible]

Details of Harm Suffered or Impact of Behaviour.

Employee (Complainant) Signature	Date (yyyy-mm-dd)
----------------------------------	-------------------