

PURPOSE

The purpose of the Workplace Violence, Harassment and Discrimination Prevention Policy (the “**Policy**”) of Wesdome Gold Mines Ltd. (“**Wesdome**” or the “**Company**”) is to foster a safe and healthy work environment that is free from workplace violence, harassment and discrimination and one where the dignity and self-esteem of everyone is respected. All directors, officers, employees, consultants, contractors and partners (“**Wesdome Representatives**”) and visitors to the Company, including vendors, suppliers and members of the general public, have the right to conduct their business at the Company in a safe and secure environment. This policy provides guidance to Wesdome Representatives in preventing and handling workplace violence, harassment and discrimination.

APPLICATION

This Policy applies to all Wesdome Representatives when they are on Company premises, at Company-sponsored events, or when conducting business on behalf of the Company, and all persons who are dealing with Wesdome Representatives or otherwise engaged in our business.

RESPECTFUL WORKPLACE

Ensuring that people are treated with respect and dignity is fundamental to Wesdome, and conduct that creates an intimidating, hostile or offensive workplace is not tolerated. Every effort will be made by the Company to identify acts of workplace violence, harassment, and discrimination, regardless of whether such conduct is perpetrated by a Wesdome Representative or a member of the public. However, the Company cannot act alone. All Wesdome Representatives, particularly managers and supervisors, must assist the Company in creating and maintaining a work environment free from workplace violence, harassment, and discrimination.

Any employee found to have engaged in any act of workplace violence, harassment or discrimination will be subject to discipline, up to and including termination for cause.

The Company will provide training on the application of this policy to ensure that all Wesdome Representatives are aware of the content of this policy and the conduct that it addresses.

WORKPLACE VIOLENCE

Workplace violence includes the use, attempted use or threatened use of physical force by a person against an employee in a workplace that causes or could cause physical injury to the employee. Workplace violence includes, but is not limited to, acts of physical violence (i.e. hitting, punching, kicking, and intimidation) and threats of violence. Examples of workplace violence include but are not limited to:

- Verbally threatening to attack an individual;
- Leaving threatening notes at, or sending threatening emails to, an individual;
- Wielding a weapon in the workplace;
- Hitting or trying to hit an individual;
- Throwing an object at an individual;
- Sexual violence against an individual.

DOMESTIC VIOLENCE

If the Company becomes aware that a Wesdome Representative may be exposed to domestic violence that could result in physical injury to the Wesdome Representative or others in the workplace, the Company is obligated to take protective measures. Protective measures may include:

- restricting access to the workplace
- providing a security escort
- removing the employee's name and contact information from the external sources
- changing the physical location of the employee's workspace to an area that is not accessible to the public

WORKPLACE HARASSMENT

Under applicable human rights legislation, harassment means engaging in a course of vexatious comment or conduct that is known or ought to be known to be unwelcome based on one of more protected grounds, which include age, ancestry, place of origin, race, ethnic origin, colour, sex, sexual orientation, gender identity, gender expression, marital status, family status, creed, disability, and record of offences (for which a pardon has been granted) (collectively, the Prohibited Grounds”).

Under applicable health and safety legislation, harassment is defined more broadly and includes any conduct, comment, or gesture against a worker in a workplace that is known or ought reasonably to be known to be unwelcome, and includes workplace sexual harassment.

Sexual harassment includes any conduct, comment, gesture, or contact of a sexual nature that: (i) is likely to cause offence or humiliation to any employee or create a negative psychological or emotional work environment; or (ii) might, on reasonable grounds, be perceived by an employee as placing a condition of a sexual nature on any aspect of the employment relationship, including any opportunity for training or promotion.

Examples of workplace harassment include but are not limited to:

- Remarks, jokes or innuendos that demean, ridicule, intimidate or offend;
- Displaying or circulating offensive pictures or materials in print or electronic form;
- Bullying or stalking.

Reasonable action taken by the employer or supervisor relating to the management and direction of workers or the workplace is not workplace harassment.

DISCRIMINATION

Unequal treatment based on the Prohibited Grounds is discrimination. The unequal treatment may be intentional or unintentional, may impose extra burdens or deny benefits, and includes rules, practices or procedures that appear neutral but have the effect of disadvantaging any person or group of people.

COMPLAINT PROCEDURE

PROTECTION OF PRIVACY

The Company recognizes that it may be difficult to come forward with Workplace Violence, Domestic Violence, Workplace Harassment and Discrimination and we will make every reasonable effort to ensure that the privacy of the persons involved in a complaint is protected. To the extent practical and appropriate under the circumstances, confidentiality will be maintained subject to the overriding responsibility of the Company to investigate and deal with complaints and act in accordance with applicable legislation.

COMPLAINT PROCEDURE

If you have experienced any form of workplace violence (including domestic violence), harassment, or discrimination or you witness or have reason to believe that another Wesdome Representative, business partner, or member of the public has been subject to acts of workplace violence (including domestic violence), harassment, or discrimination by a Wesdome Representative, you should immediately take the following steps:

1. **Corrective Action.** If you are comfortable doing so, clearly communicate to the individual that his or her behaviour or conduct is unwelcome. In some cases, this may be sufficient to put an end to the conduct.
2. **Report the Incident.** If you are a witness or victim of an act that could amount to workplace violence (including domestic violence), harassment, or discrimination, the following is reporting process that you can follow until you are satisfied that your complaint has been understood and resolved:
 - STEP ONE: Contact your supervisor and explain the situation
 - STEP TWO: Contact your superintendent if you are not satisfied with the supervisor response
 - STEP THREE: Contact your site mine manager if you are not satisfied with the Supervisor and Superintendent responses
 - STEP FOUR: Contact your on-site HR manager if you are not yet satisfied with the response
 - STEP FIVE: Contact the corporate HR Vice President if you are not yet satisfied with the response
 - STEP SIX: Contact the Chief Operating Officer if you are not yet satisfied with the response

The Whistleblower Hotline is available. If you have followed the above process and are not yet satisfied with the response, OR if anonymity is necessary or preferred, reports can be made at www.wesdome.confidenceline.net or by calling 1.800.661.9675.

3. **Document the Incident.** Take detailed written notes or otherwise record each incident, including, the date, time, place and details of what was said and done, names of possible witnesses and the surrounding circumstances.
4. **Cooperate with the Investigation.** With your assistance, the Company will be able to conduct a timely investigation into the allegations and take corrective action, if necessary.

INVESTIGATION PROCEDURES

The Company considers allegations of workplace violence, harassment and discrimination to be serious matters; however, in the event that the allegations do not comply with the policy (as per section iii below), the Company may not conduct a full investigation.

A manager or supervisor who receives a complaint must immediately advise Human Resources, which will be responsible for handling the complaint. Upon receipt of the complaint, depending on the seriousness of the allegations Human Resources will investigate the matter. The investigation procedure will include discussions with the individual filing the complaint, as well as the other individual(s) involved.

At the conclusion of the investigation, Human Resources will make one of the following decisions: (i) the complaint was substantiated; (ii) the individual(s) involved voluntarily resolved the matter to your and management's satisfaction; or (iii) the complaint was not substantiated as per the policy.

If a complaint is substantiated, Human Resources will provide the Company with proactive steps to avoid a similar incident in the future.

Where management concludes that it is necessary to impose corrective action against an employee, the range of action could include such measures as a formal apology, referral to appropriate counseling, reassignment, temporary suspension without pay, demotion or termination, depending upon the seriousness of the offence.

RETALIATION

Retaliation against any individual for reporting (or false reporting) alleged acts of workplace violence, harassment or discrimination will not be tolerated. Equally, because false accusations can have serious effects on innocent persons, the willful misuse of this policy or making false accusations will not be tolerated and may be grounds for discipline or even possible termination of employment.

ACCOMMODATION

Accommodation is an individualized process that considers the specific needs of the person (or a group of people). The Company will consider and provide reasonable accommodation to employees who require accommodation. The Company will take suitable measures to adjust a policy, practice or physical feature of the work site if it impacts certain people in the wrong way.

Accommodation will be provided up to the point of undue hardship. Undue hardship is determined on a case-by-case basis. Factors that may constitute or contribute to undue hardship include: cost, substantial disruptions of operations, and health and safety considerations. If any of these factors creates a burden that cannot be borne by the organization without undue hardship, the Company will not be obligated to accommodate.

Once implemented, accommodations may be re-evaluated as necessary, from time to time, at either the initiative of the Company or that of the employee, to ensure that the accommodation is still required and/or effective in meeting both the Company's and the individual's needs. Essentially, it will be determined whether modifications to the accommodation might be appropriate. In such circumstances, the Company and the employee will engage further in the collaborative process.

Should an accommodation request be denied or an alternative offered, the employee (or job applicant) will be informed of the reasons for the decision.

WORKPLACE VIOLENCE PREVENTION PLAN

The Company recognizes that the reporting and investigation procedure set out above may not be suitable in all cases of workplace violence. Therefore, the Company has developed the Workplace Violence Prevention Plan. The Plan, which is designed to identify and minimize the risk of violence, has three primary components: (1) Risk Management; and (2) Emergency Response & (3) Employee Support

1) RISK MANAGEMENT

The Company may conduct a violence risk assessment in the workplace. If conducted, the assessment will focus on identifying the areas and positions within the Company where there is a risk of violence and the degree of risk present. The Company will consider past incidents of workplace violence as well as workplace violence in similar organizations. Based on the results of the assessment, the Company will develop protective mechanisms specifically designed to safeguard employees who occupy the high-risk positions and workspaces.

The Company will make every effort to identify possible sources of workplace violence and will take steps to manage or eliminate the associated risk. However, the Company will only provide personal information to the extent that is reasonably necessary to protect employees from physical injury.

2) EMERGENCY RESPONSE

In emergency situations in which a significant threat of violence or actual violence occurs, employees involved in or witnessing the incident should immediately **CALL "911"**.

In addition, there is an internal Emergency Response Team that can be accessed in the event of an emergency. This includes Human Resources and/or any member of the management team that may be working on site as needed.

You have the right to reasonably refuse work if you have a reason to believe you are in danger from workplace violence. In the event of a work refusal, you must immediately contact your immediate supervisor or Human Resources so that an investigation can be conducted.

3) EMPLOYEE SUPPORT

It is a key priority for the Company to provide easily accessible and affordable support as it relates to employees dealing with issues relating to workplace violence, harassment or discrimination.

As a result, we have launched the Employee Assistance Program (EAP) to each of the Wesdome employees (at no charge). This service offers a wide range of support options for everyone and it is completely confidential.

Human Resources and management have further information on this program. (Note: the EAP should not replace the Complaint Procedure on page 3 of this policy).

EMERGENCY RESPONSE

In emergency situations in which a significant threat of violence or actual violence occurs, employees involved in or witnessing the incident should immediately **CALL “911”**.

You have the right to reasonably refuse work if you have a reason to believe you are in danger from workplace violence. In the event of a work refusal, you must immediately contact your immediate supervisor or Human Resources so that an investigation can be conducted.

REVIEW OF POLICY

This Policy will be reviewed by the Company as often as is necessary to ensure ongoing workplace safety.

QUESTIONS

Questions about this Policy should be directed to the President and Chief Executive Officer, the Chief Operating Officer or the Chief Governance Officer of the Company.

COMMUNICATION OF POLICY

To ensure that all Wesdome Representatives are aware of the Policy, a copy will be made available on the Company’s website at www.wesdome.com, and all Wesdome Representatives will be informed whenever significant changes are made. New Wesdome Representatives will be provided with a copy of this Policy upon joining or being retained by the Company and will be educated about its importance.

REVIEW AND APPROVAL

OWNER

Board of Directors

ADOPTED

Adopted on November 8, 2018

POLICY TYPE

Entity Level

LAST REVIEWED AND APPROVED

November 6, 2019

POLICY NO.

EL-005

REVIEW SCHEDULE

Annual