
Workplace Bullying and Harassment Policy

OVERVIEW

West Red Lake Gold Mines Ltd. (the “Company”) is committed to creating and maintaining a workplace environment free of discrimination and harassment (as defined below) which fosters mutual respect, integrity and professional conduct. In keeping with this commitment, the Company has established this Policy and a set of reporting/investigation procedures (the “Reporting/Investigation Procedures”) for all employees relating to the issue of workplace bullying and harassment. This Policy specifically prohibits any form of harassment or violence by or towards employees, contractors, suppliers and clients. The Company will not tolerate bullying or harassment in the workplace and will make every reasonable effort to prevent and eliminate conduct which falls within the scope of this Policy.

All Company employees, contractors, directors and officers are covered by this Policy. This Policy applies to all activities which take place on the Company’s premises (including interpersonal and electronic communications), or which are directly connected to the workplace and during any employment related duties or activities, including conferences, training sessions, travel and social functions.

DEFINING WORKPLACE BULLYING AND HARASSMENT

Each employee, officer and director is expected to treat all other employees, officers and directors with professional courtesy, dignity and respect and in a fair and non-discriminatory manner in all employment or Company related dealings.

Employees, contractors, officers and directors shall not subject any other employee, contractor, officer or director to:

- I. Discrimination because of race, colour, religion, gender, gender identity, gender expression, sexual orientation, family or marital status, political belief, age, national or ethnic origin, citizenship or physical disability and any other protected ground;
- II. Any form of harassment, which includes any conduct or comment directed at any other employee, officer, or director that will cause humiliation or intimidation, including verbal aggression, insults or bullying, but which excludes reasonable action relating to the management or direction of the Company’s workplace; or
- III. Sexual harassment, unwelcomed sexual advances, requests for sexual favours or other verbal or physical conduct which might be construed as sexual in nature.

RESPONSIBILITIES

Everyone has a role to play in ensuring that the workplace is safe, healthy and violence and harassment-free. All persons covered under this policy are responsible for conducting themselves in a manner consistent with this Policy.

All individuals will:

- maintain a safe work environment;
- not engage in or ignore violent, threatening, intimidating or other disruptive behaviours;
- promptly report any incident where the individual is subjected to, witnesses, or has knowledge of workplace violence or harassment, or has reason to believe that workplace violence or harassment may occur; and
- maintain confidentiality through the complaint, investigation and communication process unless necessary to obtain advice about their rights.

All supervisors will:

- actively promote a safe and healthy workplace, free of workplace violence and harassment;
- understand and uphold the principles of this Policy;
- ensure that workers under their authority understand and adhere to this Policy;
- immediately respond to and investigate any complaint of workplace violence or harassment that has taken place or a situation that a worker feels may become violent;
- report all cases of workplace violence and harassment to your Manager or Human Resources as soon as the immediate response has resolved; and
- cooperate and participate in the complaint, investigation and communication process as required, and maintain confidentiality in accordance with this Policy.

All management will:

- maintain a safe work environment;
- understand and uphold the principles of this Policy;
- provide appropriate information and instruction on this Policy to all workers and supervisors;
- take all reasonable and practical measures to minimize or eliminate risks of workplace violence identified through workplace violence assessments, workplace inspections, or the occurrence of an incident;
- respond promptly to all reports of violence or harassment, address immediately all incidents of workplace violence or harassment, and not condone or permit any behaviour contrary to this Policy; and
- inform complainants and alleged perpetrators in writing of the results of an investigation and any corrective action that will be taken.

If workers have questions or concerns regarding this Policy, or if they have suggestions regarding how to eliminate risks of workplace violence or harassment please contact your Supervisor, Management, Health and Safety or Human Resources.

COMPLAINT, INVESTIGATION & DISCIPLINARY PROCEDURES

A. Reporting Workplace Violence

Individuals must immediately report all incidents of workplace violence or threats of violence, including if they witness, receive or have been told that another person has witnessed or received threats of violence to their Supervisor, Management, Health and Safety or Human Resources.

Threats or violence of a serious nature should be reported to the local police, or you should call 911 immediately. Please notify your Supervisor, Management, Health and Safety and/or Human Resources as soon as possible about the incident afterward.

B. Reporting Workplace Bullying and Harassment

Any person who believes that they have been the victim of workplace harassment or has witnessed such behaviour directed at others should report the conduct to their Supervisor, Management, Health and Safety or to Human Resources.

If the alleged harasser is your Supervisor (or any other individual to whom you would have ordinarily reported the incident), you may report the incident to any of the other contacts noted above or reach out under the Company's Whistle-blower Policy.

C. Investigation of Complaints or Incidents

Complaints of workplace harassment and incidents of workplace violence will be promptly investigated by the Company. Any person who engages in or threatens workplace violence will be asked to leave the workplace and/or to cease performing any work on behalf of the Company and will be prohibited from returning pending the outcome of an investigation. All individuals are expected to cooperate fully in any investigation. If after investigation the Company finds that a violation of this Policy has occurred, it will determine what remedial action should be taken to avoid future incidents and to protect the health and safety of all workplace parties. Any individual determined by the Company to be responsible for a violation of this Policy will be subject to appropriate disciplinary action, up to and including termination of employment for cause.

Nothing in this Policy prevents or discourages an individual from filing an application with the appropriate human rights tribunal on a matter related to applicable human rights legislation. An individual also retains the right to exercise any other legal avenues that may be available.

Individuals also have the option to resolve the matter directly with the alleged offender if the individual is comfortable doing so, by requesting the alleged offender to stop the behaviour in question.

D. Communication of Results and Corrective Action

Following the conclusion of the investigation, the individual who has allegedly experienced workplace harassment or workplace violence and the alleged perpetrator, if they are covered under this Policy, will be informed in writing of the results of the investigation and of any corrective action that has been taken or that will be taken as a result of the investigation.

E. Confidentiality

To protect the interests of all involved, confidentiality will be maintained through the complaint, investigatory and disciplinary process to the extent practicable and appropriate in the circumstances. Information obtained about an incident or complaint of workplace harassment or workplace violence, including identifying information about any individuals involved, will not be

disclosed unless the disclosure is necessary for the purposes of investigating or taking corrective action with respect to the incident or complaint, or is otherwise required by law. However, investigations may require disclosure of certain information to the accused party and to other witnesses in order to gather pertinent facts.

Additionally, while the investigation is on-going, the person who has allegedly experienced workplace harassment or violence, the alleged perpetrator(s) and any witnesses should not to discuss the incident or complaint or the investigation with each other or other persons covered under this Policy or witnesses unless necessary to obtain advice about their rights.

F. No Reprisal

The Company will not retaliate in any way against anyone who files a complaint in good faith or who acts as a witness in relation to an incident or complaint. The Company also prohibits retaliation by anyone within the Company against another worker who makes a complaint in good faith or acts as a witness. Anyone who retaliates against a person for seeking assistance through this Policy, or for filing a complaint, may be subject to discipline, up to and including dismissal.

In an emergency, please call 911 immediately.

UPDATES TO POLICY

This Policy shall be reviewed at least annually, and may be updated from time to time, as appropriate.

Each time the Company undertakes an assessment of the risks of workplace violence that may arise from the nature of the workplace, the type of work or the conditions of work, Human Resources and Health and Safety will update this Policy with any measures and procedures to control the risks identified in the assessment as likely to expose an individual to physical injury.

APPROVAL OF THE POLICY

The Corporate Governance and Nominating Committee will review the Company's compliance with this Policy at least annually, and more frequently as required.

Approved by the Board of Directors

Adopted: April 23, 2025