



# FITNESS FOR WORK AND CONSUMPTION OF INTOXICATING SUBSTANCES POLICY

Dated July 15, 2024

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## I. INTRODUCTION

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The board of directors (the “**Board**”) of G Mining Ventures Corp. (“**GMIN**” or the “**Corporation**”) has adopted this fitness for work and consumption of intoxicating substances policy (this “**Policy**”) to affirm and document its commitment to maintaining a safe, healthy and productive work environment and sets forth the Corporation’s zero tolerance policy regarding the use of Drugs or Alcohol (each, as defined herein).

The Corporation is committed to the health, safety and wellness of its employees, contractors and the public. The use of Alcohol and Drugs can have serious adverse impacts in the workplace, and the Corporation is committed to ensuring that such adverse impacts do not arise. This Policy supports the occupational health and safety policy of the Corporation and forms part of the Corporation’s overall approach to risk mitigation and safety.

The objectives of this Policy are: (i) to ensure that all employees and contractors are Fit for Duty (as defined herein); (ii) ensure that all supervisors and managers have clear direction on how to assess the need for testing, initiate testing protocols and address Alcohol and Drug related issues; and (iii) deter the use of Alcohol, Drugs and other substances which may impair judgment, work performance or safety. This Policy also provides that employees or contractors who are prescribed medications that may affect their Fitness for Duty or that have an addiction to Drugs or Alcohol may be accommodated in accordance with applicable laws to ensure a safe and healthy work environment.

This Policy is subject to ongoing review and evaluation and changes may be made as necessary to meet current situations and evolving needs.

## II. SCOPE

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This Policy applies to GMIN and all of its current and future subsidiaries and all of their respective employees and contractors, and for the purposes hereof, references to the Corporation or GMIN are deemed to include references to each of the foregoing.

For greater certainty, this Policy applies at any time when employees are: (i) engaged in the Corporation’s business whether on or off a Worksite (as defined herein); (ii) on a Worksite; (iii) operating the Corporation’s vehicles and equipment; or (iv) scheduled on call.

Further, all contractors are required to either: (i) abide by this Policy; or (ii) have a substantially similar policy that adheres to or exceeds the principles and standards set forth under this Policy. The Corporation reserves the right to review any contractor policies to ensure compliance herewith. With respect to contractors that do not have a substantially similar policy that adheres to or exceeds the principles and standards set forth herein, they shall: (a) acknowledge and agree in writing that they will strictly abide (and cause all of their employees and contractors to abide) by the principles and standards set forth herein when providing services to the Corporation; and (b) provide a copy of this Policy (including all amendments thereto) to all individuals and entities employed or engaged to perform services for the Corporation.

The Corporation expects contractors to conduct themselves in an appropriate manner while performing services for the Corporation or on the Corporation's Worksites. All Contractors must be Fit for Duty and remain Fit for Duty while performing services for the Corporation.

Failure to comply with the requirements set forth in this Policy may be cause for immediate termination or dismissal.

### **III. INTERPRETATION**

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**"Alcohol"** means any substance that may be consumed and that has an alcoholic content in excess of 0.5 per cent by volume.

**"Drug"** means any substance, including, but not limited, to illicit drugs, medications, and including Marijuana/Cannabis, whether or not it is classified as an authorized drug or controlled substance under applicable laws, the use of which has the potential to change or adversely affect the way a person thinks, feels or acts.

**"Marijuana/Cannabis"** includes, but is not limited to, the hemp or cannabis plant (or any part of it) or any cannabis product, regardless of form (including herbal, hash/hashish, or hash oil) and regardless of delivery method (including inhalation, oral or topical).

**"Fitness for Duty or Fit for Duty"** means the ability to perform assigned duties safely and acceptably without any limitations or impairment due to the use or after-effects of Alcohol or Drugs.

**"Reasonable Cause"** means whenever an authorized representative has reasonable grounds to believe that the actions, appearance or conduct of employees or contractors while on duty are indicative of the use of Alcohol or Drugs.

**"Worksite"** means any place where the Corporation conducts business, including, without limitation, land and surrounding areas, property, buildings, equipment, road systems and the Corporation's vehicles, whether owned, leased or rented.

### **IV. DRUG AND ALCOHOL WORK RULE**

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Employees and contractors shall not:

- report to work or be at work while their ability to perform their duties is adversely affected because of the use of Alcohol or Drugs;
- use, possess or offer for sale Alcohol or Drugs or any product or service that may be used to attempt to tamper with any sample for an Alcohol or Drug test while on a Worksite;
- possess consumer materials on a Worksite;
- tamper with a sample for an Alcohol or Drug test; or
- refuse to comply with a request under this Policy.

Notwithstanding the foregoing:

- in exceptional cases, moderate and responsible consumption of Alcohol may be authorized by the Corporation in the context of specific activities;
- the Corporation recognizes that a certain percentage of the population has issues with Drugs and/or Alcohol. Alcohol or Drug addiction is a medical condition that can be recognized as a disability under applicable human rights legislation. Accordingly, the Corporation supports the attendance of Drug and Alcohol rehabilitation programs and therapies to resolve such dependence. Reasonable accommodation may be provided, up to the point of undue hardship, to those who disclose their disability to the Corporation; and
- the Corporation recognizes the fact that an employee or contractor could be required to use medication, such as Marijuana/Cannabis, prescribed by a licensed physician. In this event, the employee or contractor should promptly provide supporting documentation issued by their physician, use Marijuana/Cannabis strictly in accordance with the prescription, perform their duties in a safe manner, and inform the vice president, legal affairs of the Corporation (the “**VP Legal**”) and such employee’s or contractor’s supervisor to discuss what accommodations are necessary and appropriate.

## **V. ALCOHOL OR DRUG TESTING**

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All employees and contractors may be subject to testing in the following circumstances:

(1) Reasonable Cause: Testing will take place whenever the Corporation has reasonable grounds to believe that the actions, appearance or conduct of an employee or contractor while on duty are indicative of the inappropriate use of Alcohol or Drugs. The decision to test shall be made by the relevant supervisor and after consultation and agreement of a second level of supervision or management, whenever possible. The basis for the decision will be documented as soon as possible after the applicable action, appearance or conduct has taken place. The referral for a test will be based on specific, personal observations resulting from, but not limited to, the following indicators:

- observed use or evidence of inappropriate use of Alcohol or Drugs (e.g., smell of alcohol);
- erratic or atypical behaviour of the employee or contractor;
- changes in the physical appearance of the employee or contractor;
- changes in the behaviour of the employee or contractor; or
- changes in the speech patterns of the employee or contractor.

Individuals tested in these circumstances will be removed from duty until the investigation is complete. Depending on the test result, a Fitness for Duty assessment may also be required.

(2) Post-Incident: Alcohol and Drug testing may be required after a significant work-related incident as part of a full investigation into the circumstances. The decision to refer an

employee or contractor, or a group of employees or contractors, for a test will be made by the supervisor investigating the occurrence after consultation and agreement of a second level of supervision or management, whenever possible. A significant incident includes, but is not limited to, an event causing:

- fatality or serious personal injury to a worker, a member of the public or any other individual;
- an environmental incident with significant implications;
- significant loss or damage to property, equipment or vehicles; or
- significant loss of Corporation revenues.

In addition to the incidents listed above, at their discretion, management may require a post-incident test after any other significant work incident or a near-miss considered to have had significant potential for more serious consequences as part of a complete investigation. Testing will also be required after any less significant incident if, as a result of the preliminary investigation, it is concluded that Alcohol or Drug use may have been a factor (e.g., a Reasonable Cause situation).

Upon the occurrence of such incident:

- employees or contractors are expected to report the situation to their immediate supervisor as soon as possible thereafter;
- employees or contractors are expected to participate fully in any subsequent investigation; and
- failure to report an incident is a violation of this Policy and the Corporation's other safety and loss control standards.

In such a scenario, the Corporation shall employ the following procedures:

- the need for a test must be documented as part of the preliminary investigation as soon as practicable after the triggering event;
- a test will not be necessary if there is clear evidence that the acts or omissions of the employee or contractor could not have been a contributing factor (e.g., structural or mechanical failure or environmental factors);
- employees or contractors referred for a test will only be those who are identified, with reasonable grounds, as having been directly involved in the chain of acts or omissions leading up to the incident; and
- employees or contractors to be tested must not use Alcohol or Drugs until after the test has been completed, or they are advised a test is not required.

(3) Return to Duty – Post Violation: In situations where employment or engagement is continued after a Policy violation, individuals will be required to pass a return to duty test and may be subject to unannounced testing as a condition of continued employment or engagement, as will be set forth in an agreement to be entered into with the Corporation.

- (4) Return to Duty – Post Treatment: Unannounced testing may be used as a monitoring tool as determined on a case-by-case basis to support the recovery of any individual assuming duties after primary treatment for an Alcohol or Drug problem.
- (5) Other Testing Circumstances: Alcohol and Drug testing may be required in other situations (e.g., as a condition of certification to a higher-risk position, as a condition of site access, or on a random basis). All individuals affected will be advised in advance of such requirements.
- (6) Failure to Test: Failure to report directly for a test, refusal to submit to a test, refusal to agree to disclosure of a test result to the Corporation, a confirmed attempt to tamper with a test sample, or failure to report an accident which may require testing, are each a violation of this Policy.

## VI. CONFIDENTIALITY

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All records relating to an employee's or contractor's Drug or Alcohol test results generated under this Policy will be treated confidentially, in accordance with applicable laws. All records will be maintained in a secure manner separate from the employee's or contractor's personnel file so as to avoid disclosure to unauthorized persons.

## VII. CONSEQUENCES OF A POLICY VIOLATION

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Any violation of the provisions of this Policy will result in discipline up to and including termination or dismissal for cause/a serious reason. In all situations, an investigation will be conducted to verify that a Policy violation has occurred. Therefore, management has the authority and discretion to hold out of service any individual who is believed to be involved in an incident that could lead to discipline, pending the results of the investigation. The appropriate discipline in a particular case depends on the nature of the Policy violation and the circumstances surrounding the situation; the severity of the violation may warrant truncating the normal disciplinary process.

Should the Corporation determine that employment or engagement will be continued after a violation, the employee or contractor may be required to enter into an agreement governing their continued employment or engagement with the Corporation, which may require any or all of the following actions or any other condition appropriate to the situation:

- the temporary removal from their position;
- the adherence to any recommended treatment and aftercare program;
- the requirement to remain substance-free and have satisfactory performance on return to duty;
- the successful completion of a return to duty test;
- ongoing unannounced testing for the duration of their agreement with the Corporation;
- adherence to any rehabilitation conditions or requirements; and
- no further Policy violations during the monitoring period.

Failure to meet the requirements of the agreement with the Corporation during the monitoring period will be grounds for discipline up to and including termination or dismissal, as will be set forth in the agreement with the Corporation.

## **VIII. RESPONSIBILITIES**

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The Corporation is responsible for:

- ongoing leadership and supervision to ensure safe operations and effectiveness of its safety program;
- determining and providing appropriate levels of training for employees or contractors (as appropriate);
- guiding employees or contractors (as practicable) who voluntarily seek assistance for personal problems to appropriate resources while maintaining confidentiality in accordance with all applicable laws and the Corporation's privacy policies and procedures;
- making arrangements for an assessment if, in the course of any performance-related or other type of discussion, an employee or contractor states that he or she has a problem with Alcohol or Drugs;
- taking appropriate steps to investigate any possible violation of the requirements set forth in this Policy; and
- implementing the requirements of this Policy.

Employees and contractors are responsible for:

- complying with this Policy;
- informing their manager or supervisor, or the VP Legal, if they notice someone using Drugs or Alcohol during work hours or at any Worksite;
- informing their manager or supervisor, or the VP Legal, if they have a substance abuse or addiction problem; and
- informing their manager or supervisor, or the VP Legal, if they use Drugs for medical purposes.

## **IX. POLICY RESPONSIBILITY**

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The VP Legal is responsible for policy interpretation, administration and enforcement.

## **X. REVIEW**

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On an as-needed basis, the environment, social & governance committee of the Board shall (i) review this Policy, including by assessing its effectiveness, and recommend any changes to this Policy to the Board; and (ii) monitor the implementation of this Policy. The Board may also amend this Policy, as required.

**XI. EFFECTIVE DATE**

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This Policy was adopted by the Board on July 15, 2024.

## [EMPLOYEE/CONTRACTOR] ACKNOWLEDGEMENT FORM

I, \_\_\_\_\_ acknowledge that I have received and read the Policy. I understand that the Corporation maintains such Policy with respect to the use of Drugs and Alcohol requiring all employees and contractors to report to work free from impairment and Fit for Duty.

I understand that complying with this Policy is a term of my continued [employment/engagement] and I will fully comply with the terms of this Policy. I understand that if I violate the rules set forth in the Policy, I may face disciplinary action up to and including immediate termination or dismissal for cause/a serious reason.

I also understand that as a condition of my continued [employment/engagement], where the circumstances exist requiring testing or a search, as outlined in the Policy, it may require me to undergo testing for the presence of Alcohol or Drugs and I hereby consent and agree to submit to such testing.

For any points that required clarification under the Policy, I have asked for and received an explanation about the obligations set forth therein.

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[NAME]

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[Date]