



POLICY AGAINST VIOLENCE, HARASSMENT AND DISCRIMINATION IN THE WORKPLACE

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I. INTRODUCTION

The board of directors (the “**Board**”) of G Mining Ventures Corp. (“**GMIN**” or the “**Corporation**”) has adopted this policy against violence, harassment and discrimination in the workplace (this “**Policy**”) to affirm and document its commitment to preventing and ending any situation of psychological or sexual harassment, any acts or threats of violence as well as any form of discriminatory harassment within the Corporation.

GMIN has no tolerance for any kind of workplace violence, harassment and discriminatory conduct. This Policy also aims at establishing the principles of intervention that are implemented by the Corporation when a harassment complaint is filed, or when a case of harassment is reported to the Corporation or to its representative(s).

The Corporation is committed to promoting respect among its personnel and between those with whom its personnel interact. The Corporation believes it is the responsibility of each member of GMIN Personnel (as defined herein) to contribute, through his or her exemplary conduct, to a work environment free of all violence, harassment and discrimination.

All GMIN Personnel will be treated with equality during their employment and engagement with the Corporation without regard to their race, colour, religion, gender and gender identity, sex, sexual orientation, family or marital status, political belief, age, national or ethnic origin, citizenship, or physical or mental disability and any other protected grounds, in all matters, including with respect to GMIN Personnel selection, recruitment, hiring, promotion, compensation, termination, training and development. GMIN Personnel are expected to treat all other personnel with professional courtesy, dignity and respect and in a fair and non-discriminatory manner in all employment or Corporation related dealings.

The Corporation undertakes to take all reasonable means to prevent workplace violence, harassment and discrimination and, when such conduct is brought to its attention, to take all reasonable means to put an end to it, regardless of whether the conduct is perpetrated by:

- a superior towards a member of GMIN Personnel;
- a member of GMIN Personnel towards his or her superior;
- a member of GMIN Personnel towards another member of GMIN Personnel;
- several members of GMIN Personnel towards one or more other members of GMIN Personnel; or
- a third party towards a member of GMIN Personnel.

II. OBJECTIVES

Respect, civility, and dignity are fundamental values at GMIN. Furthermore, the Corporation believes that every person has the right to the safeguarding of his or her honour and reputation. Therefore, this Policy confirms GMIN’s objective to provide GMIN Personnel with a harmonious work environment, free of all forms of harassment, whether of a psychological, sexual, or discriminatory nature.

The specific objectives of this Policy are to:

- prevent and end any situation of psychological harassment, violence or incivility in the workplace;
- promote the development of individual and collective responsibility through the reporting of all forms of harassment or violence; and
- inform individuals who are victims of harassment or violence about the complaint resolution mechanisms put in place by the Corporation.

III. SCOPE

This Policy applies to GMIN and all of its current and future subsidiaries and all of their respective directors, officers and employees (regardless of their position or hierarchical level) including, notably, full-time and part-time employees, temporary employees, employees with a fixed-term contract, seasonal employees, employees from employment agencies and any other type of employee classification (collectively, “**GMIN Personnel**”), and for the purposes hereof, references to the Corporation or GMIN are deemed to include references to each of the foregoing. This Policy also applies to all third-party subcontractors or consultants working for GMIN, regardless of where they perform their duties.

This Policy covers all work-related incidents, whether they take place in the workplace or outside the usual workplace, or whether they take place during or outside normal working hours (*e.g.*, during business trips, conferences, meetings, receptions and social activities), when these activities are work-related. This Policy covers incidents that occur while the concerned individuals are in each other’s presence, or while they are communicating with each other by phone, email, text messaging, over the Internet, via teleconference or by any other means.

IV. INTERPRETATION

“**Compliance Officer**” means, at the time of approval of this Policy, the individual occupying the position of vice president, legal affairs of the Corporation, provided that the chief executive officer may designate, from time to time, any other officer of the Corporation to act as the Compliance Officer, such designation to be reported in writing promptly to the Board.

“**harassment**” or “**psychological or sexual harassment in the workplace**” means any vexatious conduct in the form of repeated behaviours, verbal comments, actions, or gestures which:

- a) are hostile or unwanted;
- b) undermine a member of GMIN Personnel’s dignity or psychological or physical integrity; and
- c) result in a harmful work environment;

the whole, in accordance with section 81.18 of the *Act respecting labour standards* (Québec). A single serious incidence of such behaviour may constitute harassment if it has the same consequences and if it has a continuing harmful effect on the person who is subjected to it.

For greater certainty, the notion of “**harassment**” must be distinguished from other situations such as interpersonal conflicts, work-related stress, difficult professional constraints or even the normal exercise of an employer’s managerial rights. Thus, this Policy in no way restricts the authority of managers in areas such as performance assessment, the management of working relationships, the application of administrative or disciplinary measures, the organization of work or the assignment of tasks.

“**incivility**” means deviant behaviour that is in violation of established standards of mutual respect in the workplace and where the intention to harm is not always present (discomfort and confusion), and includes a lack of courtesy, of politeness or of good manners, be it in actions or in words.

“**psychological harassment**” means any form of psychological harassment which may include the following, among others:

- a) bullying, threats, blackmail, or coercion;
- b) repeated innuendos, baseless accusations, insults or humiliation, repeated attempts to exclude or isolate, yelling or screaming;
- c) systematic interference with normal work conditions, sabotage of the work areas or of work instruments;
- d) abuse of a position of power or authority (official or unofficial) to threaten a person's job or to undermine his or her performance; and
- e) any violent or discriminatory words or actions directed at or against another person based on any of the grounds listed in section 10 of the *Charter of Human Rights and Freedoms* (Québec), including race, colour, sex, pregnancy, sexual orientation, marital status, age (except as provided by law), religion, political convictions, language, ethnic or national origin, social condition, handicap or the use of any means to palliate a handicap.

“**sexual harassment**” is included in the notion of “**psychological harassment**” and may manifest itself in a subtle or blatant manner through verbal, non-verbal or physical behaviour, including, among others:

- a) promises of rewards, made either implicitly or explicitly, with the aim of obtaining consent to a request of a sexual nature;
- b) threats of reprisals, made either implicitly or explicitly and whether or not they are acted upon, with a view to obtaining consent to a request of a sexual nature or following a refusal to accede to such a request; and
- c) comments or behaviours with a sexual connotation that may reasonably be perceived as creating a harmful work environment, including among others:
 - i. sexist jokes, crude, insulting or degrading remarks or practical jokes;
 - ii. advances or repeated invitations of any kind;
 - iii. remarks about physical appearance or “affectionate” nicknames;
 - iv. staring or insistent glances that make a person feel uncomfortable;
 - v. offensive drawings or written materials with “sweet talk” or affectionate wordings;

- vi. brushing or rubbing up against or touching part of another person's body (anything from a "friendly pat" to unwanted kisses); and
- vii. actions, gestures, or comments with a sexual connotation.

"vexatious behaviour" means conduct that is humiliating, offensive or abusive to the person towards whom it is directed. Such conduct injures the person's self-esteem and causes him or her anguish. It exceeds what a reasonable person would consider appropriate and acceptable in the context of his or her work.

"violence" includes any threatened, attempted or actual conduct of a person that causes or is likely to cause physical or psychological injury or harm to a member of GMIN Personnel, including, among others:

- a) physical acts (*e.g.*, hitting, shoving, pushing, kicking, sexual assault);
- b) any threat, behaviour or action which is interpreted to carry the potential to harm or endanger the safety of others, results in an act of aggression, or destroys or damages property;
- c) disruptive behaviour that is not appropriate to the work environment (*e.g.*, yelling, swearing or name calling);
- d) forms of intimidation (*e.g.*, threatening phone calls or emails, internet threats and harassment); and
- e) online forms of sexual violence, such as internet threats, harassment and sexual exploitation.

Domestic violence may also become a workplace hazard when it is brought into the workplace and may put the individual or his or her colleagues at risk.

V. ROLES AND RESPONSIBILITIES OF THE CORPORATION

A. IMPLEMENTATION OF THIS POLICY

The Corporation shall:

- take appropriate measures to make this Policy accessible, ensure that GMIN Personnel are aware of its content, ensure its implementation and uphold the values it conveys;
- provide guidance to managers regarding management and psychological harassment;
- decide on and apply administrative or disciplinary measures as regards persons who have behaved inappropriately, who have proven to have engaged in discrimination, harassment or violence or who have made unfounded complaints, in bad faith or with malicious intent; and
- offer the necessary support to any person who believes he or she is the victim of discrimination, harassment or violence in the workplace.

B. PERSONS RESPONSIBLE FOR HANDLING COMPLAINTS

The Corporation shall receive complaints and handle them diligently, draw conclusions and generate a report, where appropriate, in accordance with the complaint handling procedure set forth in this Policy.

C. GMIN PERSONNEL

GMIN Personnel shall:

- familiarize themselves with this Policy and adhere to its principles;
- contribute, through their behaviour, to ensuring that the workplace is free of all forms of discrimination, harassment and workplace violence;
- behave, at all times, in a respectful and courteous manner, free of all forms of discrimination, harassment and workplace violence;
- inform the Corporation if they believe they have witnessed behaviour at risk of violating this Policy or prohibited by it; and
- collaborate in the complaint handling procedure set forth in this Policy.

VI. WORKPLACE VIOLENCE PROCEDURE

A. FOR IMMEDIATE EMERGENCY ASSISTANCE

If there is, or is likely to be, a violent incident, GMIN Personnel should immediately remove themselves from the unsafe situation, if possible, and contact emergency services where appropriate (e.g., 9-1-1).

B. SAFETY MEASURES

The Corporation endeavours to ensure the safety of all GMIN Personnel. To that end, GMIN Personnel are asked to take the following measures:

- remove themselves from immediate danger;
- inform a co-worker or their supervisor if they will be working late and alone in the workplace;
- inform a co-worker or their supervisor if they will be attending an unfamiliar workplace;
- if they see an unaccompanied stranger or suspicious person in the workplace, notify reception immediately;
- if they notice any safety risks in the workplace, they must advise their supervisor immediately;
- familiarize themselves with the location of all exits; and
- use common sense and be alert to their surroundings.

VII. PROCEDURE FOR THE APPLICATION OF THIS POLICY

A. PRINCIPLES OF INTERVENTION AND APPLICATION PROCEDURE

1. The individual who believes he or she is the victim of workplace violence, discrimination or harassment is encouraged, as a first step and only if he or she feels safe to do so, to notify the person(s) engaged in the behaviour and/or conduct in question that he or she feels offended by this behaviour and/or conduct and consider asking them to put an end to it immediately.
2. If the behaviour and/or conduct persists despite this warning, or if the individual feels uncomfortable asking the person(s) engaged in the behaviour and/or conduct in question to put an end to it, the individual should report the situation to his or her supervisor or to the Compliance Officer as soon as possible. In all cases, the supervisor must immediately notify the Compliance Officer of the situation.
3. Any person who believes he or she is the victim of workplace violence, discrimination or harassment should keep as detailed a record as possible recounting the incidents or events that he or she perceives to be workplace violence, harassment or discrimination. This involves describing the facts (as precisely as possible) regarding the violent, discriminatory or harassing event, the location and time of the event, whether there were witnesses, and whether the alleged behaviour took place in writing, by voicemail, or via text messaging or email. In the latter cases, it is important to preserve such written evidence or recordings.
4. The individual who files a complaint with the Corporation in good faith and any other person who cooperates in the investigation will be protected against all forms of retaliation. The following actions are considered serious misconduct that may lead to remedial, administrative, and/or disciplinary actions, up to and including dismissal:
 - a) a threat or act of discrimination, harassment and/or violence in the workplace;
 - b) a complaint that has proven to be false and/or made in bad faith; or
 - c) obstructing an investigation and/or engaging in retaliation against a complainant, defendant, or witness.
5. If, for some reason, it is impossible for the individual to discuss the problem with the concerned person(s) or with his or her immediate supervisor (or if the latter is involved in the situation) or if the situation persists, then it is necessary to discuss the situation with a member of the human resources department of the Corporation (the “**HR Department**”) or, if a member of the HR Department is directly involved in the situation, with the Compliance Officer.
6. If, after discussing the situation, the individual decides to continue with the process, he or she must then file a written complaint with the HR Department (or the Compliance Officer, as the case may be) as soon as possible. The HR Department (or

the Compliance Officer, as the case may be) will determine whether the complaint is admissible, based on the terms of this Policy and the facts of the case.

B. INVESTIGATION

1. Once the complaint is deemed admissible, GMIN (through the intermediary of its HR Department or the Compliance Officer) may decide to conduct an internal investigation or entrust this investigation to a third party. In the absence of a written complaint, GMIN may nevertheless, at any time, undertake the investigation procedure if it has reasonable grounds to believe that a situation of workplace violence, discrimination or harassment exists.
2. GMIN may put an end to the investigation of the complaint, at any stage of the investigation, when it appears, on the face of the complaint itself, that it is abusive or frivolous.
3. All persons involved in the investigation process will be informed of the steps taken by GMIN. Furthermore, the persons involved in the investigation process will have the opportunity to meet with GMIN (i.e., the HR Department or the Compliance Officer) and to make representations if they so wish.

C. MEDIATION

If the parties agree, the Corporation may invite them to attempt mediation and to find a solution to the situation that is the subject of any complaint.

D. DECISION AND ACTIONS

1. At any time before the filing of the investigation report, GMIN may put in place any temporary preventive measure to protect the complainant or to put an end to any situation that may constitute violence, discrimination or harassment during the investigation.
2. At the end of the investigation process, GMIN will communicate its findings to the concerned parties, in particular, regarding the basis of the complaint. If the complaint is found to be justified, GMIN will determine the preventive, supportive and remedial and/or disciplinary actions to be implemented or imposed, as well as the appropriate administrative actions, if applicable. If the complaint proves to be unfounded, GMIN will close the file and the relevant supporting documents will be held with the Compliance Officer for the period required by law.

E. REPORT TO THE ENVIRONMENT, SOCIAL AND GOVERNANCE COMMITTEE OF THE BOARD

The Compliance Officer will report quarterly to the environment, social & governance committee of the Board (the “**ESG Committee**”) as to the number of founded complaints that have been handled by this Policy.

F. USE OF AN ANONYMOUS SUPPORT SERVICE

GMIN Personnel who believe they are being harassed and who wish to seek external and anonymous help without filing a formal complaint or without having their situation dealt with internally, can contact the Help and Information Center on Harassment in the Workplace of the Province of Québec (*Groupe d'aide et d'information sur le harcèlement au travail de la province du Québec "GAIHT"*). The GAIHT is a non-profit community organization that assists and acts as a support group for workers seeking moral support and technical assistance to defend their right to a workplace free of sexual and/or psychological harassment. The GAIHT (www.gaihst.qc.ca/home) can be reached at 514-526-0789 or at info@gaihst.qc.ca.

G. FILING A COMPLAINT WITH THE CNESST

Although GMIN prefers that harassment complaints be dealt with in accordance with the procedures set forth in this Policy, GMIN Personnel who believe they are being or have been subjected to psychological or sexual harassment in connection with their employment may also file a complaint at any time directly with the *Commission des normes, de l'équité, de la santé et de la sécurité du travail* (the "CNESST"). The maximum time limit for filing a complaint with the CNESST is two years from the last instance of harassment. The complaint can be filed online (www.cnt.gouv.qc.ca/en) or by phone at 1-844-838-0808. A person's choice to approach his or her employer first regarding a situation does not prevent him or her from also filing a complaint with the CNESST.

H. BREACH OF THIS POLICY

Any person who violates this Policy will be subject to the appropriate corrective or disciplinary actions.

I. CONFIDENTIALITY

GMIN undertakes to ensure the confidentiality of the personal information divulged or used in connection with this Policy and to limit its disclosure to that which is strictly necessary, taking into account occupational health and safety requirements, or where required or permitted by law. The Corporation is committed to ensuring that its intervention remains impartial and respectful towards the concerned individuals. The Corporation will act with discretion to resolve the situation disclosed to it and will demand that the confidentiality be respected by all the persons who, in one way or another, are involved in resolving the situation. The Corporation will not penalize a person who, in good faith, asks for its intervention.

Each person has the right to be assisted or advised by a person of their choice. An intervention does not have the effect of depriving the person of his or her remedies under any law in force. The concerned individuals will not be qualified, until there is evidence to the contrary, as a victim or a perpetrator of harassment. The request for intervention must not be based on false allegations which could prove harmful to the persons concerned.

This Policy is not intended to preclude any GMIN Personnel or person from the possibility of filing a complaint, taking civil action, or availing themselves of any other remedy provided by law. GMIN

has established an internal procedure for those who believe they are victims of violence, harassment and/or discrimination in order to resolve the situation by putting an end to such behaviour and to establish a solution and/or recommendations depending on the situation.

J. DISCLOSURE OF POLICY AND GMIN PERSONNEL COMMITMENT

A copy of this Policy shall be made available on the Corporation's website and shall also be provided to each member of GMIN Personnel. Each such individual must sign a written consent to comply with this Policy, annually.

VIII. QUESTIONS AND PERSONAL RESPONSIBILITY

Any questions with respect to the interpretation of application of this Policy must be directed to the Compliance Officer.

It is the responsibility of all GMIN Personnel to comply with applicable law and this Policy. Failure to do so may result in legal sanctions and also sanctions by the Corporation.

IX. REVIEW

On an as-needed basis, the ESG Committee 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.

X. EFFECTIVE DATE

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