



**GOLD TERRA RESOURCE CORP.  
(THE "COMPANY")**

**WORKPLACE VIOLENCE, HARASSMENT AND DISCRIMINATION POLICY**

**1. PURPOSE AND OBJECTIVES**

The Company is committed to providing an equal opportunity and safe work environment and has developed this Policy to ensure that all individuals are treated with respect and dignity, free from harassment, discrimination, bullying and retaliation. Workplace violence, harassment and/or discrimination will not be tolerated from any person in the workplace (including clients, other employees, supervisors, managers, workers and members of the public, as applicable).

**2. SCOPE**

This Policy applies to all directors, officers, full-time, part-time, casual, contract, permanent and temporary employees and to job applicants. It applies to all aspects of employment including, but not limited to, recruitment, promotions, transfers, working arrangements, compensation and benefits and termination of employment.

**3. NON-DISCRIMINATORY TREATMENT**

The Company shall not make decisions with respect to employment on the basis of personal characteristics (such as gender, race, nationality, ethnic, social and indigenous origin, religion or belief, disability, age, or sexual orientation) unrelated to requirements of the job, with the exception of:

- (a) targets mandated by law;
- (b) targets developed through local agreements for the employment of local residents, indigenous peoples, or individuals who have been historically disadvantaged; and
- (c) Company targets for the employment of local residents, indigenous peoples, or individuals who have been historically disadvantaged that are expressed in publicly accessible documents with explicit goals and justification for such targets.

**4. PROFESSIONAL WORKPLACE BEHAVIOR EXPECTATIONS**

Employees, contractors, vendors and parties engaged on the Company's behalf shall adhere to the Company's Code of Ethics (the "**Code**"), applicable policies, standards and procedures, applicable laws and regulations, and applicable rules including internal work regulations by demonstrating respectful, appropriate and professional workplace behaviors while engaging in the Company business on or off the Company's premises. Breaching workplace behavior expectations will result in corrective action, up to and including termination of employment, which will comply with applicable law and any applicable labor agreements.

The Company shall take appropriate corrective action up to and including termination of employment if Employees engage in harassment, workplace violence, or bullying.

## 5. HARASSMENT

**Workplace Harassment** means: engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome or workplace sexual harassment. Types of harassment may include, but are not limited to, teasing, intimidating, offensive jokes or innuendos, displays or distribution of offensive pictures or materials, and unwelcome, offensive and/or intimidating phone calls, texts and bullying.

**Workplace Sexual Harassment** means:

- (a) engaging in a course of vexatious comment(s) or conduct against a worker in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome, or
- (b) 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 worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

The Company will not tolerate harassment based upon any of the categories stated above or any additional legally protected category in any form of conduct, speech, written notes, photos, cartoons or electronic messages. The Company is committed to providing a work environment free of sexual harassment or other harassment and/or discrimination based on gender, race, nationality, ethnic, social and indigenous origin, religion or belief, disability, age, sexual orientation. Even harassing conduct that does not rise to the level of unlawful harassment or is not prohibited by law in a particular jurisdiction may violate the Company's standards and be grounds for corrective action up to and including termination of employment in compliance with applicable law and labor agreements.

For greater certainty, reasonable action taken by the Company and/or a supervisor relating to the management and direction of workers or the workplace is not workplace harassment.

## 6. WORK PLACE VIOLENCE

**Workplace violence** includes, but is not limited to: any act or threat of physical violence, intimidation, intentional destruction, defacing of, or threat of the defacing or destruction of the Company property or another employee's property, stalking, veiled threats of physical harm or similar intimidation, any conduct resulting in an arrest or conviction under any criminal law relating to violence or other threatening disruptive behavior that occurs at the work site. It ranges from threats and verbal abuse to physical assaults and even homicide. It includes a statement or behaviour that is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury. It can affect and involve employees, clients, customers and visitors.

It is a goal to provide a workplace in which employees, contractors, vendors and others are free from violence. The Company prohibits any acts or threats of physical violence while conducting Company business, while on Company property, or while interacting with any employees, vendors or contractors of the Company.

## **7. BULLYING**

**Bullying** includes, but is not limited to: aggressive or intimidating acts that are generally non-physical but can still create significant psychological or physical harm, including psychological harassment or violence, such as verbal abuse, acts intending to threaten, humiliate or intimidate and sabotage. For greater certainty, it is not considered harassment or bullying by supervisors and other members of management to enforce job performance requirements and standards of conduct.

It is a goal to have a workplace in which employees, contractors, vendors and others are free from bullying. The Company prohibits any acts or threats (including, but not limited to, actions in a cyber format) of bullying while conducting Company business, while on Company property, or while interacting with any Company employees, vendors or contractors.

## **8. COMPLAINTS AND INVESTIGATION**

The Company will make every reasonable, practicable effort to ensure that no employee is subjected to unlawful discrimination or harassment. If the Company becomes aware of a potential incident of discrimination or harassment, it will investigate the complaint or incident in a fair, timely and confidential manner.

The Company expects all employees to take steps to prevent any violation of this Policy. This includes identifying and raising potential issues before they lead to problems and seeking additional guidance when necessary. All workers and supervisors will receive appropriate information and instruction on the contents of the Policy and the Code, which contains more information about how to report incidents.

Employees who become aware of a violation of this Policy must report the matter to their immediate supervisor/manager, or alternatively anonymously through the to the Chair of the Audit Committee as soon as possible. If an employee reports the matter to their immediate supervisor/manager, that supervisor/manager must immediately communicate the information to the to the Chair of the Audit Committee who will determine the most appropriate method to investigate the substance of the claims and ensure that there is appropriate monitoring of progress until the matter has been satisfactorily resolved.

Employees who raise genuine concerns will not be subject to retaliation or disciplinary action. Retaliation by anyone as a consequence of making a good faith report of a possible violation of the law or this Policy is strictly prohibited and will result in disciplinary action, including termination.

This Policy is not intended to limit or constrain the reasonable exercise of management, included but not limited to manager or supervisor actions carried out in the process of progressive discipline or while implementing and enforcing health, safety and an equal opportunity workplace.

Any violation of this Policy may be grounds for disciplinary action, up to and including termination of employment.

## **9. APPROVAL**

This Policy was adopted by the Board on June 17, 2020.