O3 Mining

Responsible Exploration Program

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1 INTRODUCTION

O3 Mining is a premier gold exploration and mine development company that describes itself as the next generation of mining explorers. We do this by being proactive, exceeding legal standards, acting as an industry leader and delivering lasting benefits to our stakeholders.

The Responsible Exploration Program, anchored in the company's sustainability policy, aims to showcase the company's practices in community relationship-building, environmental protection, and economic growth. The program consolidates the responsible practices applied when working at all O3 Mining properties.

Exploration takes many forms and occurs in many contexts. The following eight principles guide this program and dictate our actions:

1. Reduce our impact;
2. Safeguard the health and safety of workers and local population;
3. Integrate leading practices in governance;
4. Apply ethical business practices;
5. Respect our stakeholders;
6. Continuously assess the risks of each project and act with due diligence;
7. Engage host communities and other affected and interested parties;
8. Create long-term value for our stakeholders.

1.1 ROLES AND RESPONSIBILITIES

O3 Mining	
Roles	**Responsibilities**
Employees	- Learn about the Responsible Exploration Program - Abide by the Responsible Exploration Program
Sustainable Development Specialist	- Ensures that everyone is aware of and understands the Responsible Exploration Program - Reviews the Program annually
Environmental Manager	- Provides support to environmental technicians - Reviews the Program annually

VP, Sustainable Development and Human Resources	- Approves the Program annually

Subcontractors and contractors	
Roles	**Responsibilities**
Employees	- Learn about the Responsible Exploration Program - Abide by the Responsible Exploration Program
Management	- Communicates the program to all employees assigned to O3 Mining projects - Ensures that the Responsible Exploration Program is implemented, understood and respected

2 RESPONSIBLE PRACTICES

Sustainability is an integral part of our business model at every level of the company, including the Board of Directors. O3 Mining has a Sustainable Development Committee within its Board of Directors (Sustainable Development Committee Mandate). This committee assists the O3 Mining Board in its oversight role in health & safety, the environment and community relations matters. Having created a committee specifically to deal with sustainability issues demonstrates the commitment of our directors and senior management to this vital issue. O3 Mining's Board establishes the foundations of its sustainability approach and oversees business activities to ensure that the company stays on course in terms of development, reporting, continuous improvement and creating lasting benefits for all stakeholders.

The development of responsible projects is at the heart of our strategy. We understand that our projects will only move forward if we work in collaboration with our stakeholders and respect the environment in which we operate. The first step was to implement the ECOLOGO UL2723[1] Certification for mining exploration. Our teams and suppliers work in accordance with the certification's environmental, social and governance (ESG) criteria. Ongoing employee training, the application of ESG procedures and the continuous search for innovative solutions to improve our ESG performance will be at the centre of our ongoing exploration activities.

2.1 ECOLOGO CERTIFICATION

O3 Mining has been accredited to the ECOLOGO UL2723[2] responsible development standard for mineral exploration, which provides third-party verification of the application of environmental, social and economic best practices.

Through certification, a framework was established identifying the ESG criteria to be met (Legal requirements, compliance with sustainable development principles along the value chain, environmental quality, quality of life, local investment, work environment, business

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[1] https://canada.ul.com/ulcprograms/explore/

[2] https://canada.ul.com/ulcprograms/explore/

ethics, transparency and reporting, innovation, economic efficiency) according to 100 precise indicators.

ECOLOGO-certified suppliers are given preference to work at O3 Mining sites to ensure compliance with the company's principles.

2.1.1 Training program

Every new employee, contractor or person accessing O3 Mining's properties must attend a one-hour induction training session. The session is divided into three parts: introduction to the company, health and safety, and sustainability. One of the topics covered in the induction training is the code of conduct that must be followed by anyone working at O3 Mining sites.

2.1.2 General ECOLOGO indicators

The main criteria that O3 Mining must meet under ECOLOGO certification are compliance with legal requirements and compliance with sustainable development principles along the value chain.

Legal Requirements

"*All laws, regulations, guidelines and policies in effect shall be respected by the Company. Certain legal elements, which are marked with an asterisk, are subject to specific requirements in this Program, particularly due to the importance emphasized by several experts (serious consequences for non-adherence), the random nature of audits conducted by different ministries, as well as the possibility of exporting the normative document in other jurisdictions (identification of the minimum to be complied with). However, the organization's legal compliance is not limited to these requirements. It is the company's responsibility to identify and comply with all other legal requirements related to its operations.*[3] **"**

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[3] Excerpt from ECOLOGO's UL 2723 certification program for mining exploration companies

Compliance with sustainable development principles along the value chain

"For the purpose of this Program, the value chain represents every activity of all three steps: prospecting, exploration and development. It is common practice for companies who hold claims (exploration companies) to mandate suppliers to carry out various works included in these steps. If the applying company is a claim-holding company that mandates a supplier, such company is responsible for ensuring that the delegated works comply with the requirements of this Program. If the applying company is a supplier, the execution of its work must comply with the requirements of this Program. However, to the extent that it does not hold the concerned claims, the applying company is not responsible for obtaining permits, authorization certificates and establishing agreements with potentially affected stakeholders or concerned Aboriginal communities, unless it has been specifically mandated to do so. Otherwise, it must obtain the information pertaining to the conditions for performing its work set out in the permits, authorization certificates and agreements for compliance and, consequently, comply with the requirements of this Program.[4]"

2.2 ENVIRONMENT

Respect for the environment is at the heart of all decisions and actions at O3 Mining. It dictates our working methods for all projects. The company does not hesitate to make considerable investments in order to apply environmental protection best practices and limit the impact of its projects on the environment.

2.2.1 Policies and procedures

The purpose of all policies and protocols is to establish the framework to be followed by O3 Mining employees and service providers working on our sites.

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[4] Excerpt from ECOLOGO's UL 2723 certification program for mining exploration companies

The Sustainability Policy (POL-ENV-001) sets out the guidelines to be followed (see Appendix 1).

The Spill Management Plan (PRO-ENV-001) includes the regulations applicable to the Val-d'Or site, the roles and responsibilities of the various players, the organization of a spill response and its features, as well as all related forms and lists. The plan also includes a spill management diagram outlining the steps to be followed in the event of a spill. This diagram is posted on all drills and is available in the field binder kept in all vehicles circulating on the property.

The Environmental Drilling Procedure (PRO-ENV-002) sets out the rules for equipment movement, refuelling, water management (use and conservation), and management of drilling mud and hazardous waste.

A procedure has been put in place for reporting species that are threatened, vulnerable or likely to be designated as such and invasive species identified in the field (PRO-ENV-003 and PRO-ENV-004).

2.2.2 Environmental training program

In addition to induction training, exploration and environmental technicians receive "field technician" training in environmental drilling procedures, woodland caribou identification, identification of different wetland and aquatic environments, riparian buffer protection standards and distances to be maintained during deforestation work.

2.2.3 Inspection program

Numerous inspections are carried out as work is done at the company's sites. The following forms cover both environmental and health & safety aspects:

- ➢ Field Validation – before any work (FOR-ENV-004)
- ➢ Field Validation – after brush clearing (FOR-ENV-005)
- ➢ Drilling Inspection (FOR-ENV-006)
- ➢ Post-Drilling Site Monitoring (FOR-ENV-007)
- ➢ Stripping Inspection (FOR-ENV-009)

> Post-Stripping Site Monitoring (FOR-ENV-010)
> Trench Inspection (FOR-ENV-015)
> Post-Trench Site Monitoring (FOR-ENV-016)

2.2.4 Best practices

O3 Mining rigorously complies with all regulations and often goes above and beyond regulatory standards.

Revegetation program

Reforestation of drill sites is a condition of deforestation permits for pieces of land in the municipality of Val-d'Or and sites in the woodland caribou buffer zone. However, this type of land accounts for less than 25% of the area explored by O3 Mining, and our revegetation program goes far beyond that. Since September 2021, over 20,000 trees have been planted on 100,000 m^2.

Sites where additional work is planned are not reforested. However, these sites are seeded to protect soils from erosion and enable biodiversity to recover more quickly. Since 2021, 460 kg of seeds have been planted to revegetate 125,000 m^2 of land. Sites seeding is not required by regulation but is considered a best practice.

Protecting sensitive areas
The company attaches great importance to protecting sensitive areas and has put a number of measures in place to do so. For example, according to the *Regulation respecting the Sustainable Development of Forests in the Domain of the State* (RADF), a strip of woodland of 10 metres on private land and 20 metres on public land must be maintained between a drilling site and an aquatic environment. O3 Mining maintains a 30-metre strip of woodland between the drilling site and aquatic environment, regardless of the status of the land. In more sensitive areas, wood mats are used to protect the ground from machine traffic. In more remote areas, equipment is moved by helicopter, reducing the need to cut down trees and preserving soil and vegetation.

Recovering cut wood

Wood cut during land clearing for access roads and drilling sites is recovered wherever possible. Commercial wood is sold to the forest producer, while wood that does not meet the criteria for sale can be used on drilling sites to level drills. What is not used is donated to non-profit organizations, such as recreational vehicle (quad) clubs or to Indigenous communities for firewood.

Cohabiting with beaversThe exploration area is home to many beavers and their dams regularly flood the roads used. Trapping beavers is not a viable solution since the cleared area is quickly recolonized by another individual. Where possible, a pre-dam is built before the destructive dam is removed to encourage the beaver to settle somewhere where it will not cause a disturbance. When a pre-dam cannot be built, a PVC pipe is installed in the dam to keep water levels at the desired height. The pipes are removed in the fall to allow water levels to return to normal and provide a suitable habitat for beavers over the winter.

Reducing paper use

The company has rolled out a mobile application to carry out field inspections on cell phones, thus reducing the company's use of paper.

Reducing flag tape use

During field work, sample collection points are now marked using GPS rather than flag tape. This initiative has helped to reduce flag tape use by over 80%.

Other initiatives at the Val-d'Or camp

Recycling bins are available in offices, employee kitchens, the core library, washrooms, etc. for the selective collection of recyclable materials (paper, pencils, batteries, ink cartridges, etc.). This reduces the amount of waste sent to the city's landfill.

Every year, employees take part in a clean-up activity at O3 Mining sites as part of the health & safety and environmental awareness week.

As a climate change initiative and to encourage our employees to purchase personal electric vehicles, we have installed an electric vehicle charging station at our Val-d'Or office (charging capacity for four (4) vehicles).

2.2.5   ECOLOGO indicators related to the environment

To meet the company's ECOLOGO Certification commitments, O3 Mining must respect the following indicators:

6.1.1. Consumption of resources: Water, GHG, propane and fuel consumption shall be compiled in a continuous improvement perspective.

6.1.2. Residual materials: Residual materials shall be managed according to the 4 Rs hierarchy (Reduction at source, Reuse, Recycling and Recovery).

6.2.1. Emissions of particles: Emissions of particles from the transfer, fall or handling of materials shall not be visible more than 2 metres from the emission point.

6.3.1. Forestry work: When a company's operations include cutting trees, construction or improvement of infrastructure (roads, bridges, culverts, bypasses, etc.) in forests on public land, it shall obtain a permit and comply with the applicable regulation.

6.3.2. Contaminant release: A certificate of authorization shall be obtained when development work is likely to alter the quality of the environment (emissions, deposits, release or clearing of contaminants).

6.3.3. Traffic: Machinery traffic shall be kept to a minimum in the project zone; traffic for setting up infrastructure for mineral operations shall not be within at least 20 meters of the riparian ecotone of water environments or wetlands in order to avoid soil compaction and rutting. However, a 5-metre maximum width breakthrough can be cleared to install equipment.

6.3.4. Machinery - Maintenance: All machinery shall be maintained in good condition and be equipped with the necessary materials for cleaning accidental spills in order to avoid any type of leaks.

6.3.5. Hazardous materials – emissions: All operations involving hazardous materials shall be conducted in accordance with the Regulation respecting hazardous materials as prescribed in the Environment Quality Act (EQA).

6.3.6. Hazardous materials - storage and disposal: Overflow basins shall be placed under hazardous materials containers in order to retain any leakage of contaminants. Accumulated hazardous materials and rainwater shall be emptied and managed in accordance with the Regulation respecting hazardous materials as prescribed in the EQA.

6.3.7. Hazardous materials - emergency plan: In case of accidental spillage of hazardous materials, an emergency plan shall be established, and the necessary cleaning materials shall be in place.

6.3.8. Lubricants: Hydraulic oils, lubricants and soaps that are non-toxic, biodegradable (60% in 28 days) and compliant with international environmental certifications shall be used when operating drilling machinery.

6.3.9. Petroleum products – storage: Petroleum products shall be stored in accordance with requirements stipulated in the Petroleum Equipment Installations chapters of the Construction Code and Safety Code of the Régie du bâtiment du Québec (RBQ).

6.3.11. Restoration: All exploration sites shall be restored and given back their natural properties:

    a. disposal of hazardous and non-hazardous waste;

    b. recovery and disposal of contaminated soil;

    c. dismantling of buildings and infrastructures;

    d. removing or cutting of casing to a safe level (ground level wherever possible);

    e. sealing drillholes;

    f. levelling the land;

    g. preserving and reusing the vegetation cover (excavated soil);

    h. sowing native plant seeds.

6.3.12. Rehabilitation and restoration plan – financial guarantee: A rehabilitation and restoration plan shall be approved and executed, and a financial guarantee shall be deposited prior to the following operations:

a. the extraction or movement of mineral substances for geological or geochemical sampling in amounts of 500 metric tons or more;

b. the movement of 5,000 m3 or more of unconsolidated deposits;

c. rock stripping or the movement of unconsolidated deposits covering an area of 10,000 m2 or more;

d. the preparation of accumulation areas for mineral exploration;

e. any work carried out in respect of material deposited in accumulation areas;

f. the sinking of access ramps and shafts, and any other excavation.

6.3.13. Rehabilitation: Upon completion of development operations, the generic criteria of the Land Protection and Rehabilitation Regulation as prescribed in the EQA shall be met.

6.4.1. Water environments or wetlands: When a company's operations occur near-water environments or wetlands, before they begin, the MDDELCC shall validate and confirm the type of water environment or wetland on the site. Conditions specific to the environment shall be applied.

6.4.2. Campsite: All campsites shall comply with the MDDELCC's environmental requirements for temporary work camps.

6.4.3. Groundwater withdrawal: No mineral drilling operations shall occur within 30 meters of a water extraction site independent of a water system, and at 100 meters from a water extraction site that supplies a water system.

6.4.4. Water withdrawal: The amount of water withdrawn from a body of water for mineral drilling purposes shall not compromise the natural environment's integrity (15% maximum water flow where the withdrawal is performed). Also, a strainer shall be installed at the end of the hose from the pump.

6.4.5. Suspended solids: Prior to the beginning of operations, facilities and materials that minimize the emission of suspended solids in wetlands or water environment shall be installed in the drilling machine's immediate surroundings.

6.4.6. Wastewater: Wastewater generated by mineral exploration work that reaches wetlands or water environments shall be free of oil and suspended solids visible to the naked eye.

6.4.7. Pumping stations: Pumping stations shall be located at least 10 meters away from the riparian ecotone, and 15 meters when the slope is greater than 30%.

6.4.8. Disposal of drilling mud – urban areas and agricultural land: When operations occur in urban areas or on agricultural land, drilling mud shall be disposed of at a site authorized by the MDDELCC.

6.4.9. Disposal of drilling mud- other territories: Drilling mud shall be eliminated in a small natural depression or in a safe and fitted trench at least 30 meters away from wetlands and water environments in order to contain suspended solids and avoid any leaching of particles to these areas.

6.4.10. Machinery – provisioning and storage: Provisioning and storage of all mobile machinery shall occur at least 30 meters away from water environments and outside of wetlands.

6.4.11. Wetland drilling – Winter: Other than drilling by helicopter, drilling in wetlands shall be conducted in winter, when the ground is frozen over 35 centimetres deep, except in cases that are justified.

6.4.12. Wetland drilling - Seasons other than winter - Machinery: When it is impossible to conduct wetland drilling during winter, machinery and a drilling platform with greater load bearing shall be used.

6.4.13. Wetland drilling - Seasons other than winter – Access road: When it is impossible to conduct wetland drilling during winter and an access road shall be built, engineered mats shall be used instead of gravel. If gravel must be used, a geotextile

shall be placed underneath it so that all materials can be recovered at the end of operations.

6.5.1. Territorial restrictions: The companies shall respect restrictions that affect the territory and apply all practices recommended by the relevant departments.

6.5.2. Threatened or vulnerable species (TVS): Companies whose operations may alter the habitat of a TVS (provincial legislation), or a species at risk (federal legislation), shall obtain authorization from the appropriate department and implement any recommended mitigation or avoidance procedures.

6.5.3. Species likely to be threatened or vulnerable (SDTV): Companies whose operations may alter the habitat of SDTV shall apply any mitigation or avoidance procedures recommended by the concerned departments.

6.5.4. Species that are threatened, vulnerable, or likely to be designated as such (STVD): Employees shall be familiar with STVD and endangered species potentially present on site in order to recognize them even if they have not been previously identified or located. In such cases, the company shall notify the relevant department and apply any recommended mitigation or avoidance procedures.

6.5.5. Area of wildlife interest and wildlife habitat: The presence of areas of wildlife interest and wildlife habitats shall be verified prior to all operations. Any mitigation or avoidance procedures recommended by relevant ministries shall be applied.

6.5.6. Dam, nest and den: No beaver dam, animal nest or den shall be destroyed except where such habitat is likely to cause serious harm to an existing infrastructure or when a permit from the MFFP has been issued prior to destruction.

6.5.7. Fish: When a company's operations may cause serious harm to fish that are part of commercial, recreational or Aboriginal fisheries, or fish that support such fishery, an authorization from Fisheries and Oceans Canada shall be obtained.

6.5.8. Fire protection: When a company's operations take place in forests between April 15 and November 15, the relevant authority shall be notified and a protection plan shall be obtained, if required.

6.5.9. Private land: SDTV, the species at risk and their habitats located on private land shall benefit from the same protection as those on public property. If such a species is encountered, all mitigation or avoidance procedures recommended by the appropriate departments shall be applied.

6.5.10. Deforestation: Deforestation, in quantity and quality (e.g., rare species, old trees) shall be kept to a minimum.

6.5.11. Invasive alien species: Material and equipment that come in contact with the natural habitat shall be free from fragments or seeds of invasive alien species.

2.3 HEALTH & SAFETY

The health and safety of employees, contractors and the general public is a priority at O3 Mining. In addition to the environment, ECOLOGO Certification also covers health and safety aspects. The company does not hesitate to go above and beyond the certification standards.

All teams working on O3 Mining properties receive a field binder containing incident and spill procedures, a map of meeting points and emergency resources, procedures and logs for species that are threatened, vulnerable or likely to be designated as such and invasive species, a vehicle cleaning guide and all reporting forms.

2.3.1 Manuals, policies, programs and procedures

All health and safety commitments, methods and procedures are described in different documents such as policies, manuals, programs, procedures and protocols.

The company has three health and safety policies:
- Health & Safety Policy (POL-SST-001)
- Planned Inspection Management (POL-SST-002)
- Management of Infectious Respiratory Diseases (POL-SST-003)

The company has four manuals and programs:
- Emergency Plan (MAN-SST-001)
- Prevention Program (MAN-SST-002)
- Respiratory Protection Program (MAN-SST-003)
- Lockout Program (MAN-SST-004)

The company has nine protocols and procedures:
- Lockout Procedure for Genest Saws (PRO-SST-001)
- Lockout Procedure for Almonté Saws (PRO-SST-002)
- Lone Worker Procedure (PRO-SST-003)
- Storm Procedure (PRO-SST-004)
- Maintenance Procedure for Almonte Saws (PRO-SST-005)
- Maintenance Procedure for Genest Saws (PRO-SST-006)

➢ Lockout Procedure for Almonte Saw Connector (PRO-SST-007)
➢ Argo Maintenance Protocol (PRO-SST-008)
➢ Procedure for Working on Ice Cover (PRO-SST-009)

2.3.2 Training program

Employees must undergo training specific to their position. Examples of training courses offered to employees include:
➢ First Aid in the Workplace
➢ First Aid in Remote Areas
➢ Due Diligence and Bill C-21
➢ WHMIS 2015
➢ Snowmobile Operation
➢ Boat Operation
➢ ATV Operation
➢ Wheel Loader
➢ Slinging
➢ Transportation of Dangerous Goods
➢ Mechanical Saw Operation (manual felling)
➢ Job Card Training (supervision)
➢ Using the Portable Analyzer (pXRF)

2.3.3 ECOLOGO indicators related to health and safety

6.3.10. Explosives: When a company's operations involve the possession, storage and transport of explosives, a permit shall be obtained from the Sûreté du Québec (SQ).
7.5.1. Risk identification and mitigation measures: Prior to the beginning of operations, health and safety risks associated with mineral exploration shall be identified and a prevention plan shall be established according to recognized best practices.
7.5.2. Emergency response procedures: Prior to the beginning of operations, emergency response procedures for the health and safety risks identified shall be developed and implemented in collaboration with local authorities. If applicable, the risks identified and the procedures established shall be communicated to potentially affected stakeholders and concerned Aboriginal communities.

9.1.1. Prevention program: A prevention program intended to eliminate at the source all risks to the health, safety and physical well-being of workers shall be accessible and understood by all employees. The program shall address the following:

    a. occupational health and safety policy;

    b. roles and responsibilities of workers, supervisors and executives

    c. disciplinary policy;

    d. procedures for newly hired employees;

    e. occupational health and safety training and information programs;

    f. programs for the adaptation of facilities and camp sites to the standards prescribed by the regulations for workplace infrastructure, work organization, equipment, material, contaminants, hazardous substances, procedures and resources, and collective safety equipment;

    g. measures for monitoring work environment quality and preventive maintenance;

    h. procedures for the use of vehicles, equipment and machinery;

    i. procedures for specific operations;

    j. personal protective equipment for a specific type of work

9.1.2. Emergency plan: A plan describing procedures to be applied in case of emergency shall be accessible to and understood by all employees. The emergency plan shall be developed and implemented in collaboration with local authorities, and address the following:

    a. evacuation plan (including camps);

    b. accidental spills - hazardous materials;

    c. evacuation and transportation of injured workers;

    d. missing workers;

    e. natural hazards (forest fires, lightning, storm, cold, heat);

    f. wilderness survival;

    g. insect bites;

    h. wildlife;

    i. allergies;

    j. first aid.

9.1.3. Training: All employees shall receive proper training and possess the required skills and knowledge to safely perform the assigned work. An internal tracking system for training needs shall be in place. Examples of training according to the types of operations include:

    a. Workplace Hazardous Materials Information System (WHMIS);

    b. lockout;

c. transportation of hazardous materials;

d. tree cutting;

e. first aid and cardiopulmonary resuscitation (CPR) (for at least two workers in the field);

f. forklift;

g. driving licence;

h. firearms license;

i. acquisition, possession, storage, transport and use of explosives;

j. blasting;

k. emergency procedures (wilderness survival, wildlife, evacuation, etc.);

l. specific operations (working on ice, use of equipment, machinery and vehicles, etc.).

9.1.4. Risk analysis - identification: An analysis of the site shall be done before the start of operations in order to identify potential hazards on the territory and the actions required to ensure the health and safety of workers.

9.1.5. Risk analysis - participation: Risk analysis exercises involving all implicated workers shall be carried out periodically in order to identify potential hazards and actions required to ensure the health and safety of employees.

9.1.6. Communication: A mechanism allowing workers and suppliers to raise and discuss occupational health and safety issues shall be in place. Employees responsible for issues of health and safety shall be designated and their names displayed in visible and accessible locations.

9.1.7. Supervision: Employees shall have adequate supervision to accomplish their tasks. When a worker performs a task alone in an isolated area where it is impossible to request assistance, an effective periodic or constant monitoring method shall be implemented.

9.1.8. Working on ice: Work performed on ice shall be carried out in accordance with guidelines in the manual *Best Practice for Building and Working Safely on Ice Covers in Alberta.*

2.4 SOCIAL RESPONSIBILITY

O3 Mining strives to have a positive impact on the local community by creating economic, social and environmental value. This is reflected in the company's corporate governance and in concrete community involvement actions.

2.4.1 Governance

The Board of Directors and management of O3 Mining believe that following corporate governance best practices delivers superior returns to shareholders and long-term benefits to stakeholders. The members of our Board are committed to following corporate governance best practices and the best regulatory principles. O3 Mining has an established set of five (5) policies that are based on transparency, honesty and accountability.

Policies

Policies governing the activities of senior leadership:

- ➢ Whistleblowing (POL-RH-006)
- ➢ Confidentiality and Insider Trading (POL-RH-010)
- ➢ Code of Ethics and Conduct (POL-RH-011)
- ➢ Expenditure Control (POL-ADM-002)
- ➢ Business Travel (POL-ADM-003)

ECOLOGO indicators related to governance

10.1.1. Appointment of executives and managers: During their past experiences, the executives and managers appointed shall have demonstrated outstanding conduct in regard to business ethics and compliance with legal requirements.

10.1.2. Code of ethics: The company shall develop and implement a code describing its policies and procedures on organizational ethics. This document shall be accessible, understood, and respected by management and employees, and shall address the following:

    a. governance procedures and practices;

    b. conflicts of interest, including transactions and agreements in respect of which an executive or manager has a material interest;

    c. protection and proper use of corporate assets and opportunities;

d. confidentiality of corporate information;

e. fair dealing with the issuer's security holders, customers, suppliers, competitors and employees;

f. compliance with laws, rules and regulations;

g. divulgation of financial contributions and official public positions with regard to public policy;

h. measures to be applied regarding illegal or unethical conduct.

10.1.3. Identification of risks of corruption: Risks of corruption and ways to prevent them shall be identified in collaboration with employees, and shall be part of the company's ethical policies**.**

10.1.4. Training: Management and employees who are responsible for negotiating agreements shall be trained in business ethics in order to eradicate all forms of corruption.

10.1.5. Monitoring: A mechanism for employees and suppliers to report confidentially and without fear of reprisal any illegal or unethical conduct shall be in place.

10.2.1. Participation: Executives and managers shall be diligent in regards to their participation in meetings and shall have all relevant information, reasonably available and necessary for making informed decisions.

10.2.2. Conflicts of interest: Executives and managers shall prioritize the company's interests and remain independent from pressure or influence, prevent potential conflicts of interest, and forfeit all personal profits they may be liable to gain by virtue of their position.

10.2.3. Disclosure of irregularities: Executives and managers shall act with due diligence when they have knowledge of or suspect fraud or a breach of ethics.

10.2.4. Training - Accountability: Executives and managers shall complete governance training.

10.2.5. Training - Due diligence: Executives, managers and supervisors shall be trained in due diligence in occupational health and safety.

11.1.1. Information sharing - Mineral exploration projects and continuous disclosure: Information sharing regarding mineral exploration projects and ongoing disclosure shall comply with the Quebec Professional Code and the regulations of the Securities Act for public companies.

11.1.2. Information sharing – Shareholders: Executives and managers shall continuously disclose information to shareholders regarding their operations, including their governance practices, and any event or changes that may affect the value of the company.

2.4.2 Community engagement

As a corporate citizen, O3 Mining is committed to keeping the community informed as the project progresses, demonstrating transparency and respect for the voice of the community, and listening to the concerns and questions of the host community. To ensure good communication with the public, the company has hired a Community Liaison Agent whose primary task is to keep communication channels with the public open. In addition to individual meetings held by the liaison officer, several meetings are held each year to inform the public about project progress, in addition to public consultation meetings to find out their opinions on specific subjects and workshops to learn more about how they use the land.

Following past meetings, mitigation measures were put in place to address certain concerns. Dust suppressant was spread on dirt roads, drills were fitted with padded outer covers to reduce noise, and flag tape was replaced by GPS points.

O3 Mining has set up a Donations and Sponsorships Program to support various organizations in the region. The program focuses donations and sponsorships primarily on the education and health sectors.

In addition to the ECOLOGO requirements, the company has established policies, protocols and procedures to ensure that its commitments to the community are met.

Policies
➢ Local Procurement (POL-ADM-001)
➢ Reporting (POL-REL-002)

Protocols and procedures

➢ Community Relations Protocol (PRO-DD-001)
➢ Protocol for the Acquisition of Property Within the Project Footprint (PRO-REL-002)
➢ Compensation Protocol (PRO-REL-003)

ECOLOGO indicators related to host communities

7.1.1. Identifying potentially affected stakeholders: Prior to each new series of operations affecting a growing territory, potentially affected stakeholders who will be invited to participate in the information-sharing process shall be identified.

7.1.2. Claim acquisition notice: Within 60 days of the claim acquisition (filed with the Ministry or another company), the municipality, the Regional County Municipality (RCM) for non-organized territories, the landowner or tenant, shall be informed of the claim acquisition and given the company representative's contact information.

7.1.3. Notice to the municipality – Commencement of work: A minimum of 30 days before commencement of work, the municipality and the RCM for unorganized territories, shall be informed of their nature, their location as well as their timetable.

7.1.4. Permission to access the land: At least 30 days before the beginning of operations on a private property, a written agreement shall be reached with the landowner or tenant, confirming permission to access the land and the conditions under which the mineral exploration will be conducted (nature, impacts and location of intended operations, schedule, mitigation measures, etc.).

7.1.5. Participation of potentially affected stakeholders: The company shall put in place information and exchange mechanisms, in addition to inviting potentially affected stakeholders to express their concerns to a company representative responsible for collecting, processing and following up on them within a maximum of 30 days.

7.1.6. Information sharing: Information provided to potentially affected stakeholders shall be published and meet the following requirements:

> **a.** be understandable: communicated in a language suited to the stakeholders, and outlined clearly;
>
> **b**. be relevant: present a clear and direct link with the subject and be of importance to the stakeholders;
>
> **c**. be objective: based on experience, realistic and free of personal interests;
>
> **d**. be timely: communicated at the relevant time;
>
> **e**. be reliable: based on serious sources and facts that can be validated;
>
> **f**. be truthful: based on reality and non-misleading;
>
> **g**. be complete: not partial, present both positive and negative aspects;
>
> **h**. be precise: focused and accurate;
>
> **i**. be accessible: free to consult and available in a way that serves the stakeholders best.

7.1.7. Implementation of mitigation measures: Mitigation of negative impacts, as previously determined in consultation with affected stakeholders, shall apply.

7.1.8. Stakeholder satisfaction: The satisfaction of affected stakeholders with respect to the implemented mitigation measures shall be verified; corrective measures shall apply, if necessary.

7.1.9. Remedial measure: If the mitigation measures provided for in indicator 7.1.7 prove insufficient, the company shall agree with affected stakeholders on a remedial measure proportional to the sustained impacts. If an agreement is impossible, the company shall indicate why the demands of affected stakeholders have been rejected.

7.1.10. Dispute settlement procedure: A dispute settlement procedure that specifies responsible parties, procedures and deadlines, shall be proposed to affected stakeholders.

7.1.11. Fulfilling commitments: Commitments between the company and potentially affected stakeholders shall be respected.

7.2.1. Identification of aboriginal communities affected: During claim acquisition, the company shall collaborate with relevant departments in order to identify concerned Aboriginal communities and their representatives.

7.2.2. Claim acquisition notice: Within 60 days of the claim acquisition (filed with the Ministry or another company), the concerned Aboriginal communities affected shall be informed of the claim acquisition and given the company representative's contact information.

7.2.3. Communication protocol: A minimum of 30 days before the commencement of work on the territory where rights are claimed or established, a communication protocol shall be established with the concerned Aboriginal communities, specifying how the information will be shared throughout the project. The protocol shall be periodically revised and
address the following:

    a. company's communication officers;
    b. terms of agreement;
    c. protocol objectives;
    d. standards for communication;
    e. priority areas of communication (nature and impacts of projected work, location of their execution, schedule, mitigation measures);
    f. dispute settlement procedure (if requested);
    g. period of application.

7.2.4. Information sharing: information provided to concerned Aboriginal communities shall meet the following requirements:

a. be understandable: communicated in a language suited to the stakeholders, and outlined clearly;

b. be relevant: present a clear and direct link with the subject and be of importance to the community;

c. be objective: based on experience, realistic and free of personal interests;

d. be timely: communicated at the relevant time;

e. be reliable: based on serious sources and facts that can be validated;

f. be truthful: based on reality and non-misleading;

g. be complete: not partial, present both positive and negative aspects;

h. be precise: focused and accurate;

i. be accessible: free to consult and available in a way that serves the community best.

7.2.5. Implementation of mitigation measures: Mitigation measures for negative impacts on landmarks, traditional and economic activities, as previously established with concerned Aboriginal communities, shall apply.

7.2.6. Satisfaction of concerned Aboriginal communities: The satisfaction of concerned Aboriginal communities with respect to the implemented mitigation measures shall be verified; corrective measures shall apply, if necessary.

7.2.7. Remedial measure: If the mitigation measures provided for in indicator 7.2.5 prove insufficient, the company shall agree with concerned Aboriginal communities on a remedial measure proportional to the sustained impacts. If an agreement is impossible, the company shall indicate why the demands of concerned Aboriginal communities have been rejected.

7.2.8. Fulfilling commitments: Commitments between the company and the concerned Aboriginal communities shall be respected.

7.3.1 Consultation of local authorities: When planning operations involving noisy machinery or the use of explosives, local authorities shall be consulted in order to identify and implement mitigation measures required to comply with local noise and sensory nuisance regulations.

7.4.1. Quality of visual environment: Measures to mitigate and remediate negative visual impacts that affect sites of interest identified by local authorities shall be applied.

7.6.1. Respect for cultural heritage: Measures to mitigate and remedy negative impacts on cultural heritage sites that are not protected by the legislation in force,

and which are identified by local, regional and governmental authorities, shall be implemented.

8.1.1. <u>Finding local labour</u>: Companies shall collaborate with relevant organizations in order to access local labour.

8.1.2. <u>Hiring policy</u>: At the development stage, a hiring policy that promotes the selection of local labour with equal qualification shall be implemented and respected.

8.2.1. <u>Finding local suppliers</u>: Companies shall collaborate with relevant organizations in order to find local and regional suppliers.

8.2.2. <u>Selection of local suppliers</u>: Qualified and competitive (price, availability, technical support, equipment, technology) local or regional suppliers shall be prioritized.

APPENDIX 1

O3 Mining

Responsible Exploration Program				
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O3 Mining

SUSTAINABILITY POLICY

O3 Mining's sustainability objectives are focused on three key components: Society, Environment and Economy. O3 Mining will rigorously comply with the current laws and regulations of the jurisdictions in which we conduct our activities. We are committed to protecting the environment and the health and safety of our employees and the general public, while taking into consideration the concerns of the host communities in which we conduct our activities. O3 Mining strives to create wealth and opportunities for our shareholders and partners.

In order to achieve our sustainability objectives, O3 Mining is committed to:

- Evaluating each of our activities in terms of the potential impacts and risks for the natural, human and social environments, with the goal of prevention and protection to achieve "zero harm";
- Designing and using our facilities with approved technologies and the most efficient techniques in order to minimize the risk to the environment, and to the health and safety of people, while keeping in mind the concerns of the host communities;
- Providing the appropriate tools, resources and safety and environmental training to employees and contractors;
- Ensuring the conservation and reasonable consumption of natural resources and consumable goods, such as water and energy;
- Minimizing the footprint of our activities and emissions to air, water and land, including waste generation;
- Implementing emergency action plans to mitigate effects of unforeseen events;
- Striving for continuous improvement by implementing monitoring programs, analyzing statistics, conducting audits and establishing plans to improve performance;
- Rehabilitating sites to ensure physical and chemical stability through progressive rehabilitation;
- Identifying and establishing a relationship with stakeholders with an interest in our activities;
- Contributing to the socio-economic development of our host communities through investment in community-focused sustainability projects;
- Contributing to the economic development of our host communities by creating jobs and promoting local purchases;
- Building long term relationships with Aboriginal communities with an interest in our projects;
- Ensuring that employees, subcontractors and suppliers of good and services adhere to the policy's requirements;
- Ensuring that O3 Mining's board of directors stays informed about Health, Safety and Environmental performance and any necessary corrective actions taken to improve our performance; and
- Ensuring that the necessary resources – human, material and financial – are available to promote, plan and guide this policy.

Jose Vizquerra
President and CEO
Date: November 8, 2019