



Workplace Discrimination & Harassment Policy and Procedures

Individuals have the right to be treated with respect in the workplace. Northisle Copper & Gold Inc, in exercising its responsibility as the employer, will endeavor at all times to provide a work environment that supports both productivity and the personal goals, dignity and self-esteem of every person.

Management has a responsibility to respond immediately to stop any activity in the workplace that undermines this policy, whether or not there has been a complaint. Employees have an equal responsibility not to be frivolous or vindictive in making accusations. Inaction on the part of any individual may result in disciplinary action.

Non-Discrimination

Northisle Copper & Gold Inc will not itself discriminate, and will not tolerate discrimination by its employees, against any employee or job applicant on the protected grounds of; race, colour, ancestry, place of origin, religion, marital status, family status, physical or mental disability, sex, gender expression, gender identity, sexual orientation, age, criminal conviction, political belief or any other ground prescribed by any law that applies to Northisle Copper & Gold Inc. “Discrimination” means any action or inaction that differentiates between employees, imposes a disadvantage, or withholds an advantage on the basis of a protected ground.

The responsibility for creating and maintaining a positive work environment rests with all of us. In addition to avoiding discrimination, Northisle Copper & Gold Inc will not, and employees should not, condone behaviour in the workplace that is likely to undermine work relationships or productivity. All employees are expected to recognize and refrain from actions that offend, embarrass or humiliate others, whether deliberate or not.

Workplace Harassment

All Northisle Copper & Gold Inc employees, contractors, and visitors are entitled to be treated with dignity, free from harassment of any kind. Harassment will not be tolerated.

“General harassment” is any unwelcome behaviour, conduct or communication directed at an individual that is offensive to that and that the offender ought to have known would cause that worker to be humiliated or intimidated. It may be persistent or sporadic creating an intimidating, offensive or embarrassing work environment. It excludes any reasonable action taken by an employer or supervisor relating to the management and direction of workers or the place of employment.

“Sexual harassment” is any offensive sexual comment, gesture, physical contact or demand for sexual favours, real or perceived, that is deliberate and unwelcome, or that should be known to be unwelcome. It creates an intimidating, offensive or embarrassing work environment.

“Racial harassment” is any derogatory comments, taunts, threats, jokes, teasing or jeering about race, colour, national or ethnic origins, or about adornments and rituals associated with cultural or religious beliefs.

“Bullying” is any unwanted, unwelcome, persistent behaviour, and is best understood as a direct systematic attempt either by means of physical or psychological behaviour to undermine the employee’s sense of value of his/her employment. It can include verbal abuse, insults and name-calling, persistent unwarranted criticism, showing hostility through sustained unfriendly contact or exclusion, offensive gestures, staring or aggressive facial expressions, unfair delegation of duties, and shouting or other types of aggressive behaviour.

Among the behaviours that may constitute harassment are:

- differential treatment of employees or co-workers based on race, gender, ethnicity, etc.;
- racist or sexist humour;
- pornographic or other offensive materials displayed in the workplace;
- unwanted physical contact;
- patronizing or condescending behaviour;
- abusing a position of authority to undermine someone’s respect, self-confidence and performance;
- physical assault;
- a promise of better treatment in return for sexual favours; or
- implied or expressed threats for refusal of a sexual request.

This policy applies to all persons and all activities on Northisle Copper & Gold Inc premises, as well as all organization-sanctioned conferences, training seminars, travel, sales calls and social events.

If you feel you are being subjected to harassment, you should:

- make your objection clearly known to the offender and ask him or her to stop;
- prepare and maintain a written record of the dates, times, nature of the behaviour and any witnesses; and
- report the behaviour to the Head of Sustainability and Community Relations.

Northisle Copper & Gold Inc will deal with the complaint as with any other complaint of this type, as discussed in our Discrimination and Harassment Complaint Procedure.

Preventing harassment is everyone’s responsibility. Supervisors and managers are expected to act against harassment even without a complaint, and employees are expected to express their

disapproval if they encounter harassing behaviour.

It is important to note that retaliation against anyone reporting or thought to have reported harassment is prohibited. Such retaliation shall be considered a serious violation of this policy. Encouraging others to retaliate also violates this policy.

A complainant is free, at any point, to pursue his or her complaint under BC human rights law.

Discrimination and Harassment Complaint Procedure

In the event of a complaint of general or sexual harassment (as discussed under Workplace Harassment) the following procedures should be followed:

- 1) If the complainant has confronted his or her harasser and has not been able to rectify the situation, an informal report should be made to the Head of Sustainability and Community Relations who will attempt to resolve the problem.
- 2) The complainant should keep a record of the event or events, including the person involved, place, date, time and witnesses.
- 3) If the Head of Sustainability and Community Relations cannot solve the problem in an informal manner, then the complainant is encouraged to file a formal, written complaint with the Chief Financial Officer (CFO) within 30 calendar days. The alleged offender will receive a copy of the complaint. The Chief Financial Officer will investigate as quickly as possible, and will attempt to formally resolve the problem within 10 calendar days after completing the investigation.
- 4) If no resolution can be reached, the complainant may ask for a meeting with the Chief Executive Officer (CEO) within five business days after the formal process has been completed under Step 3, above.
- 5) This procedure cannot and does not impair an individual's right to seek resolution through the Human Rights commission. If after all these steps have been taken and the complainant is still not satisfied with the resolution then the complainant has the option to take his or her complaint to the BC Human Rights Commission.

Anyone guilty of harassment will be liable to discipline up to and including dismissal, with the penalty to be at Northisle Copper & Gold Inc's discretion. However, if it is determined that an individual has lodged a complaint out of malicious intent, then the complainant will be subject to punishment up to and including dismissal at the discretion of Northisle Copper & Gold Inc. No one shall be disciplined or otherwise penalized for participating in this Complaint Procedure in good faith.

All parties to the complaint must keep the matter confidential.

Complaint Resolution Procedure

Northisle Copper & Gold Inc. maintains an open-door policy. All employees, whether staff or management, will be treated fairly, justly and equally. Northisle Copper & Gold Inc will act immediately if problems do occur. If something happens that disturbs you and upsets your peace of mind, take advantage of the following procedure:

1. Whenever possible, try to resolve the problem with those directly involved.
2. If you feel that the problem is still not being solved after trying to resolve it yourself, then you may want to take the situation to your supervisor.
3. If you have not obtained a solution to the situation within 5 days of your complaint then you have a right to take whatever is troubling you to the Head of Sustainability and Community Relations. The complaint must be in writing and must include all relevant circumstances. We respect the confidentiality of these discussions and will make every effort to resolve the situation. The employee and supervisor will receive a written reply within 10 calendar days.
4. If after this step you feel the issue is still not resolved, request a meeting with the Chief Executive Officer (CEO). Talking together in a friendly and intelligent fashion, the two of you should be able to arrive at an answer.

These discussions will take place in the privacy of management offices and away from other employees. All employees are encouraged to bring forward to management any complaints or recommendations dealing with safety, health standards, proper working conditions, performance appraisals, discipline and fair management practices, without fear of reprisal.

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