



# APPENDIX Z TREASURY METALS LIMITED CORPORATE POLICIES



Treasury Metals Revised EIS Report Goliath Gold Project April 2018



### NOTE TO READER APPENDIX Z

In April 2015, Treasury Metals submitted an Environmental Impact Statement (EIS) for the proposed Goliath Gold Project (the Project) to the Canadian Environmental Assessment Agency (the Agency) for consideration under the Canadian Environmental Assessment Act (CEAA), 2012. The Agency reviewed the submission and informed Treasury Metals that the requirements of the EIS Guidelines for the Project were met and that the Agency would begin its technical review of the submission. In June 2015, the Agency issued a series of information requests to Treasury Metals regarding the EIS and supporting appendices (referred to herein as the Round 1 information requests). The Round 1 information requests included questions from the Agency, other federal and provincial reviewers, and members of Indigenous communities, as well as interested stakeholders. As part of the Round 1 information request process, the Agency requested that Treasury Metals consolidate the responses to the information requests into a revised EIS for the Project.

Appendix Z to the revised EIS (TML Corporate Policies) presents corporate governance policies and procedures for Treasury Metals. No changes have been made to this appendix from the original EIS issued in April 2015.

As part of the process to revise the EIS, Treasury Metals has undertaken a review of the status for the various appendices. The status of each appendix to the revised EIS has been classified as one of the following:

- Unchanged: The appendix remains unchanged from the original EIS, and has been re-issued as part revised EIS.
- Minor Changes: The appendix remains relatively unchanged from the original EIS, and has been re-issued with relevant clarification.
- Major Revisions: The appendix has been substantially changed from the original EIS. A rewritten appendix has been issued as part of the revised EIS.
- **Superseded:** The appendix is no longer required to support the EIS. The information in the original appendix has been replaced by information provided in a new appendix prepared to support the revised EIS.
- New: This is a new appendix prepared to support the revised EIS.

The following table provides a listing of the appendices to the revised EIS, along with a listing of the status of each appendix and their description.



Treasury Metals Revised EIS Report Goliath Gold Project April 2018



List of Appendices to the Revised EIS		
Appendix	Status	Description
Appendix A	Major Revisions	Table of Concordance
Appendix B	Unchanged	Optimization Study
Appendix C	Unchanged	Mining Study
Appendix D	Major Revisions	Tailings Storage Facility
Appendix E	Minor Changes	Traffic Study
Appendix F	Major Revisions	Water Management Plan
Appendix G	Superseded	Environmental Baseline
Appendix H	Minor Changes	Acoustic Environment Study
Appendix I	Unchanged	Light Environment Study
Appendix J	Minor Changes	Air Quality Study
Appendix K	Minor Changes	Geochemistry
Appendix L	Superseded	Geochemical Modelling
Appendix M	Minor Changes	Hydrogeology
Appendix N	Unchanged	Surface Hydrology
Appendix O	Superseded	Hydrologic Modeling
Appendix P	Unchanged	Aquatics DST
Appendix Q	Major Revisions	Fisheries and Habitat
Appendix R	Major Revisions	Terrestrial
Appendix S	Major Revisions	Wetlands
Appendix T	Unchanged	Socio-Economic
Appendix U	Minor Changes	Heritage Resources
Appendix V	Major Revisions	Public Engagement
Appendix W	Unchanged	Screening Level Risk Assessment
Appendix X	Major Revisions	Alternatives Assessment Matrix
Appendix Y	Unchanged	EIS Guidelines
Appendix Z	Unchanged	TML Corporate Policies
Appendix AA	Major Revisions	List of Mineral Claims
Appendix BB	Unchanged	Preliminary Economic Assessment
Appendix CC	Unchanged	Mining, Dynamic And Dependable For Ontario's Future
Appendix DD	Major Revisions	Indigenous Engagement Report
Appendix EE	Unchanged	Country Foods Assessment
Appendix FF	Unchanged	Photo Record Of The Goliath Gold Project
Appendix GG	Minor Changes	TSF Failure Modelling
Appendix HH	Unchanged	Failure Modes And Effects Analysis
Appendix II	Major Revisions	Draft Fisheries Compensation Strategy and Plans
Appendix JJ	New	Water Report
Appendix KK	New	Conceptual Closure Plan
Appendix LL	New	Impact Footprints and Effects



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## Z.0 CORPORATE GOVERNANCE POLICIES, OCCUPATION HEALTH AND SAFETY POLICY AND PROCEDURES, AND ENVIRONMENTAL POLICY



### Z.1 CORPORATE GOVERNACE POLICIES

Corporate governance policies and procedures are summarized below. These policies are reviewed annually subject to Board of Director review; full versions are available at the Project Office.

### **Z.1.1 Code of Business Conduct and Ethics**

#### Z.1.1.1 Introduction

A goal at Treasury Metals Inc. (or the "Company") is to achieve the highest business and personal ethical standards as well as to comply with all the laws and regulations that apply to our business. Adherence to the standards contained in this Code will help to ensure decisions that reflect care for all of our stakeholders. This Code of Business Conduct and Ethics (the "Code") is intended as an overview of the Company's guiding principles and not as a restatement of Company policies and procedures.

This Code of Business Conduct and Ethics applies to all directors, employees, advisors and consultants / contractors ("Team Members") of Treasury Metals Inc. and of any of its subsidiaries.

Ethical business behaviour is the responsibility of every Team Member of the Company and is reflected not only in our relations with each other but also with other organizations, suppliers, competitors, governments and the public. Whatever the area of activity and whatever the degree of responsibility, the Company expects each Team Member to act in a manner that will enhance its reputation for honesty, integrity and the faithful performance of its undertakings and obligations.

This Code cannot and is not intended to cover every applicable law or provide answers to all questions that might arise; for that we must ultimately rely on each person's good sense of what is right, including a sense of when it is proper to seek guidance from others on the appropriate course of conduct. Because our business depends upon the reputation of the Company and its Team Members for integrity and principled business conduct, in many instances this Code goes beyond the requirements of the law.

Employees should refer to policies contained in the Employee Manual or other employee documentation applicable to the particular Treasury Metals Inc. office/subsidiary for which you work (hereinafter, the "Employee Manual"), for a description of the policies and required reporting procedures applicable to them. This Code is a statement of goals and expectations for individual and business conduct. It is not intended to and does not in any way constitute an employment contract or assurance of continued employment, and does not create any rights in any employee, client, supplier, competitor, shareholder or any other person or entity.

It is the obligation of each and every Team Member of Treasury Metals to become familiar with the goals and policies of the Company and integrate them into every aspect of our business. Our ethics are ultimately determined by all of us as we do our daily jobs. Our standard has been, and will continue to be, that of the highest ethical conduct.

It is the responsibility of the Chief Executive Officer to ensure the *Code of Business Conduct and Ethics* is reviewed and updated annually.

### Z.1.1.2 Conflicts of Interest

Team Members of Treasury Metals have a duty of loyalty to the Company, and must therefore avoid any actual or apparent conflict of interest with the Company. A conflict situation can arise when a Team Member takes actions or has interests that may make it difficult to perform his or her work objectively and effectively. Conflicts of interest also arise when a Team Member, or a member of his or her family, receives improper personal benefits as a result of his or her position in the Company.



In exercising our responsibilities, it is vital that we be guided by what is in the best interests of the Company. All Team Members are required to conduct their personal and business affairs in such a way so as to avoid conflicts – *or even the appearance of conflicts* – with the interests of the Company, its shareholders and its customers.

It is each Team Member's responsibility to ensure that his or her personal conduct complies with the following principles and to make appropriate disclosures when actual or potential conflicts may arise. And, although the principles below are discussed in terms of the employees of the Company, each of us must also exercise care to avoid actual or potential conflicts of interest which might arise because of the activities of our close family members or other members of our household.

- 1. Team Members may not use their affiliation with the Company for personal benefit.
- Examples of such prohibited activities include:
  - Team Members receiving remuneration, gifts, entertainment or other compensation from any entity performing work or services for the Company or from any entity which is seeking to do business with the Company. However, gifts or favours that are generally considered as common business or social courtesies are acceptable only as long as they are reasonable in type, frequency and value.
  - Team Members having a financial interest in an entity that sells goods or services to the Company where the employee is able to influence the Company's business transactions with that entity.
  - Team Members using for their own personal gain or for the benefit of others any confidential or "inside" information obtained as a result of their employment with the Company.
  - Team Members misappropriating to themselves or to others the benefit of any business venture or opportunity about which the employees learn or develop in the course of their employment and which is related to a current or prospective business of the Company.
- 2. Team Members may not be employed by or affiliated with a competitor.
  - Serving as an employee, director, officer, partner, consultant, agent of, or having a significant ownership
    interest in, an organization, which competes with the Company, violates your duty of loyalty to the
    Company and is prohibited. All other employment or contractual obligations to other entities must be
    disclosed in writing to the Chief Financial Officer, or the President of the Company, and if deemed a
    conflict, must be terminated.
- Team Members have a responsibility to disclose actual and potential conflicts.
  - Determining whether you have a conflict and, if so, what to do about it can be difficult and no set of
    guidelines or statement of principles, however comprehensive and detailed, can hope to cover all
    situations or address every question of judgment. Every team Member is, therefore, required to disclose
    all possible conflicts or appearances of conflict. If you have any doubt about your disclosure obligations
    in a particular situation, the best course is to consult with your supervisor, the Chief Financial Officer, or
    the Chief Executive Officer of the Company.
  - The Chief Executive Officer and members of the Board of Directors must report any such circumstances to the Audit Committee.

### Z.1.1.3 Health, Safety, Environment & Corporate Social Responsibility

The Company is committed to managing and operating our assets in a manner that is protective of human health and safety and the environment, as well as corporate social responsibility. It is our policy to comply, in all material respects, with applicable health, safety and environmental laws and regulations. Each Team Member is also expected to comply with our policies, programs, standards and procedures.



### Z.1.1.3.1 Relations, Respect and Contributions

Team Members function as a team. A Team Member's success as part of this team depends on their contribution and ability to inspire the trust and confidence of their coworkers and supervisors. Respect for the rights and dignity of others and a dedication to the good of our Company are essential.

A cornerstone of our success is the teamwork of our directors, officers and employees. We must each respect the rights of others while working as a team to fulfill our objectives. To best function as part of a team, you must be trustworthy and dedicated to high standards of performance. The relationships between business groups also require teamwork.

To facilitate respect and contribution among employees, we have implemented the following employment policies:

- To hire, pay and assign work on the basis of qualifications and performance;
- Not to discriminate on the basis of race, religion, ethnicity, national origin, color, gender, age, sexual
  orientation, citizenship, veteran's status, marital status or disability;
- To attract and retain a highly talented workforce;
- · To encourage skill growth through training and education and promotional opportunities;
- To encourage an open discussion between all levels of employees and to provide an opportunity for feedback from the top to the bottom and from the bottom to the top;
- To prohibit harassment (including sexual, physical, verbal) by others while an employee is on the job;
- To make the safety and security of our employees while at Company facilities a priority;
- · To recognize and reward additional efforts that go beyond our expectations; and
- To respect all workers' rights to dignity and personal privacy by not disclosing employee information, including protected health information, unnecessarily.

### Z.1.1.3.2 Use of Information

The mineral exploration and development business, like other industries, is based on the collection, organization, evaluation and preservation of information. We must be efficient in gathering and storing information, be thorough in our analysis of information collected, and be creative in generating new information. Our ability to remain competitive requires both our willingness and alertness to share information within our organization and our awareness that certain types of information need to be protected from disclosure. It is especially important to maintain our reputation by safeguarding information entrusted to us; it is also legally required in many cases.

As an employer, the Company maintains personnel records on every employee. This information is collected and maintained only for employee relations or legal reasons. Access to this information is limited within the Company, and is generally released to those outside of the Company only if required by law. Preserving the confidentiality of such information is necessary for creation of a productive and comfortable work environment.

### Z.1.1.3.3 Corporate Opportunities

No Team Member may: (a) take for himself or herself personally opportunities that are discovered through the use of Company property, information or position; (b) use Company property, information or position for personal gain; or (c) compete with the Company. Team Members owe a duty to the Company to advance its legitimate interests when the opportunity to do so arises.

#### Z.1.1.3.4 Use of Inside Information

It is the Company's goal to protect shareholder investments through strict enforcement of the prohibition against insider trading set forth in provincial securities laws and regulations. No Team Member may buy or sell securities of Treasury Metals at a time when in possession of "material non-public information." Passing such information to someone who may buy or sell securities is also prohibited. The prohibition on insider trading applies to Treasury



Metals' securities and to securities of other companies if the director, officer or employee learns of material non-public information about those other companies in the course of his or her duties for Treasury Metals. This prohibition also extends to certain non-employees who may learn about the "material non-public information" about the Company such as spouses, relatives, and close friends of Team Members. Insider trading is both unethical and illegal and will be dealt with firmly. If you have any questions in connection with whether or not a trade in the company shares is permitted at any particular time, please contact the President, Chief Financial Officer, Vice President Investor Relations or Corporate Secretary of the Company.

### Z.1.1.3.5 Fair Dealing

Each Team Member shall endeavor to deal fairly and in good faith with Treasury Metals customers, shareholders, employees, suppliers, regulators, business partners, competitors and others. No Team Member shall take unfair advantage of anyone through manipulation, concealment, abuse of privileged or confidential information, misrepresentation, fraudulent behavior or any other unfair dealing practice.

### **Z.1.1.3.6** Bribery

Team Members are strictly forbidden from offering, promising or giving money, gifts, loans, rewards, favors or anything of value to any governmental official, employee, agent or other intermediary which is prohibited by law. Those paying a bribe may subject the Company and themselves to civil and criminal penalties. When dealing with government customers or officials, no improper payments will be tolerated. If you receive any offer of money or gifts that is intended to influence a business decision, it should be reported to your supervisor or the CEO immediately.

The Company prohibits improper payments in all of its activities, whether these activities are with governments or in the private sector.

### Z.1.1.3.7 Protection and Use of Company Assets

Company assets, such as information, materials, supplies, time, intellectual property, software, hardware, and facilities, among other property, are valuable resources owned, licensed, or otherwise belonging to the Company. Safeguarding Company assets is the responsibility of all Team Members. All Company assets should be used for legitimate business purposes. The personal use of Company assets without permission is prohibited.

Team Members are expected to use Company equipment and materials (e.g. telephones, computers, software and photocopiers) for Company business only. All Company equipment and materials are dedicated for business use only and the Company reserves the right to monitor and investigate usage of Company equipment and materials at its discretion.

Team Members should not use Company resources for personal benefit or to benefit persons or entities outside the Company. In certain circumstances, the Company may approve of the use of particular corporate resources for charitable or community purposes.

Team Members must maintain accurate records and abide by corporate policies concerning reimbursable expenses, and eligibility for all Company benefits, including sick leave, education and disability payments.

Team Members may not make payments or give gifts (other than gifts of nominal value that are generally considered as common business or social courtesies) to government workers or outside suppliers in order to influence regulatory or business decisions.

The Company has established internal control procedures to ensure that assets are protected and properly used, and that financial records and reports are accurate and reliable. Team Members share the responsibility for maintaining and complying with required internal controls.



The Company's success depends upon the integrity of all of its Team Members. The Company has instituted a comprehensive set of procedures, rules and controls to prevent fraud and dishonesty and it will take all action necessary and appropriate to enforce these policies and procedures.

### Z.1.1.3.8 Accounting Practices

It is the policy of Treasury Metals to fully and fairly disclose the financial condition of the Company in compliance with applicable accounting principles, laws, rules and regulations. All books and records of Treasury Metals shall be kept in such a way, as to fully and fairly reflect all Company transactions.

#### Z.1.1.3.9 Records Retention

Officers and employees are expected to become familiar with the Company's policies regarding records retention applicable to them and to strictly adhere to those procedures. Records may not be destroyed except in accordance with the applicable records retention policy. If you have any questions in this regard, do not hesitate to contact your supervisor.

### Z.1.1.3.10 Compliance with Laws, Rules, Regulations

The Company is subject to myriad laws and regulations on how we conduct our business. It is critically important that both the Company and its employees comply with the letter and spirit of the laws, which regulate the conduct of our business.

All aspects of Company business are impacted by compliance requirements; for example, accounting and financial reporting and governmental relations. Team Members must be aware of the applications of the laws that affect the performance of their job responsibilities and must carry out their job responsibilities in a manner that ensures that the Company is in compliance with external statutory, regulatory and industry requirements.

Treasury Metals takes a proactive stance on compliance with all applicable laws, rules, and regulations, including insider-trading laws. In addition, the Company requires that its officers and employees comply with the policies set out from time to time in the Employee Handbook.

#### Z.1.1.3.11 Prohibited Substances

Team Members are prohibited from using alcohol, illegal drugs or other prohibited items, including legal drugs which affect the ability to perform your work duties, while on Company premises. You are also prohibited from the possession or use of alcoholic beverages, firearms, weapons or explosives on our property unless authorized by the CEO. You are also prohibited from reporting to work while under the influence of alcohol or illegal drugs.

### Z.1.1.3.12 Duty to Report and Consequences

Every Team Member has a duty to adhere to this *Code of Business Conduct and Ethics* and all existing Company policies and to report to the Company any suspected violations in accordance with applicable procedures.

Team Members shall report suspected violations of Company policies by following the reporting procedures for that specific policy of Treasury Metals or its subsidiary. All other suspected violations of the Code must be reported to the employee's supervisor or, if no specific reporting procedures are stated, to the President of the Company, Martin Walter at 416-214-4654. The Company will investigate any matter so reported and may take appropriate disciplinary and corrective action, up to and including termination. The Company forbids retaliation against employees who report violations of this *Code of Business Conduct and Ethics* in good faith.



### **Z.1.1.4 Scope**

This Code does not supersede, change or alter the existing Company policies and procedures already in place as communicated to Team Members. Certain policies referred to herein are contained in their entirety in other employee documentation.

No Company policy can provide definitive answers to all questions. If Team Members have questions regarding any of the goals, or standards discussed or policies referenced in this Code or are in doubt about the best course of action in a particular situation, the Team Members should refer to the reporting requirements for that goal or standard as stated in the Code, or the reporting requirements for policies as stated in other company documentation and contact the person or party designated.

#### Z.1.1.5 Administration of the Code

The Code of Business Conduct is designed to ensure consistency in how employees conduct themselves within the Company, and in their dealings outside of the Company. The procedures for handling potential violations of the Code have been developed to ensure consistency in the process across the organization. No set of rules can cover all circumstances. These guidelines may be varied as necessary to conform to local law or contract.

The responsibility for administering the Code rests with the Chief Executive Officer, with oversight by the Board of Directors.

### Z.1.1.6 Acknowledgement by the Team Member

A copy of this Code of Business Conduct and Ethics is to be given to:

- · Each new director, employee, advisor and consultant
- All directors, officers and employees on an annual basis and whenever changes are made.

The abovementioned persons are expected to read the *Code of Business Conduct and Ethics* and sign the Acknowledgement below as evidence of having read and understood the Code. A copy of the signed *Code of Business Conduct and Ethics* should be kept in the director, employee, advisor and consultant's human resource file

### Z.1.2 Whistleblower Policy

Treasury Metals Inc. (the "Company") is committed to maintaining the highest standards of business conduct and ethics in its accounting standards and disclosures, internal accounting controls, and audit practices. It is the policy of the Company to comply with and require its directors, officers, and employees to comply with all applicable legal and regulatory requirements relating to corporate reporting and disclosure, accounting and auditing controls and procedures, securities compliance and other matters pertaining to fraud against shareholders. Every employee has the responsibility to assist the Company in meeting these requirements.

This policy applies to Treasury Metals Inc. and all its operating subsidiaries.

The Company's internal controls and corporate reporting and disclosure procedures are intended to prevent, deter and remedy any violation of the applicable laws and regulations that relate to corporate reporting and disclosure, accounting and auditing controls and procedures, securities compliance and other matters pertaining to fraud against the shareholders. Even the best systems of control and procedures, however, cannot provide absolute safeguards against such violations. The Company has a responsibility to investigate and, if required, report to appropriate governmental authorities, any violations relating to corporate reporting and disclosure, accounting and auditing controls and procedures, securities compliance and other matters pertaining to fraud against shareholders, and the actions taken by the Company to remedy such violations.



This policy governs the process through which employees and others, either directly or anonymously, can notify the Company's Compliance Officer or Audit Committee of the Company's Board of Directors of potential violations or concerns. In addition, this policy establishes a mechanism for responding to, and keeping records of, complaints from employees and others regarding such potential violations or concerns.

### Z.1.2.1 Reporting Alleged Violations or Concerns

If an employee reasonably believes that any Company employee or other person acting on behalf of the Company has violated any legal or regulatory requirements or internal policy relating to accounting standards and disclosures, internal accounting controls, or matters related to the internal or external audit of the Company's financial statements, the employee should immediately report his or her concern to the Company's Compliance Officer, as follows:

In writing:

Treasury Metals Inc.

Mr. Dennis Gibson

130 King Street West, Suite 3680, PO Box 99

Toronto, Ontario

M5X 1B1

PRIVATE and CONFIDENTIAL

By e-mail: dennis@treasurymetals.com

By Telephone: (416) 214-4654

If an employee is not comfortable reporting a concern to the Compliance Officer, he or she should report the concern to any supervisor or member of management whom he or she is comfortable approaching. Any manager or other supervisory employee who receives a report of an alleged violation must immediately forward the report to the Compliance Officer. The Compliance Officer will communicate all reports of alleged violations to the Company's Audit Committee.

The Audit Committee is composed entirely of directors of the Company the majority of whom are independent of the officers and management of the Company. The Audit Committee is solely responsible for investigating and responding to reports of violations regarding accounting standards and disclosures, internal accounting controls, or matters related to the internal or external audit of the Company's financial statements. If the employee is uncomfortable approaching the Compliance Officer or any member of management, he or she may report alleged violations directly to the Audit Committee using any of the following methods:

In writing:

Treasury Metals Inc.

Mr. Douglas Bache

130 King Street West, Suite 3680, PO Box 99

Toronto, Ontario

M5X 1B1

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By e-mail: douglas.bache@sympatico.ca



By Telephone: (416) 779-8483

Reports of alleged violations may be submitted to the Compliance Officer or the Audit Committee <u>anonymously</u> if the employee desires. Although anonymous reports may be submitted via any of the above methods, reports submitted by e-mail or telephone tend to be less likely to remain anonymous and confidential than those submitted in writing. All reports of alleged violations, whether or not they were submitted anonymously, will be kept in strict confidence to the extent possible, consistent with the Company's need to conduct an adequate investigation.

Reports of alleged violations should be factual, rather than speculative or conclusory, and should contain as much specific detail as possible to allow for proper assessment. The report describing an alleged violation or concern should be candid and should set forth all of the information that the employee knows regarding the allegation or concern. In addition, the complaint should contain sufficient corroborating information to support the commencement of an investigation. The Company may, in its reasonable discretion, determine not to commence an investigation if a complaint contains only unspecified or broad allegations of wrongdoing without appropriate factual support.

### Z.1.2.2 Investigation of Complaints

Upon receipt of a complaint alleging a violation of any provincial or federal law or internal policy regarding accounting standards and disclosures, internal accounting controls, or matters related to the internal or external audit of the Company's financial statements, the Audit Committee, or a designated member of the Committee, will make a determination as to whether a reasonable basis exists for commencing an investigation into the conduct alleged in the complaint. If the Audit Committee or its designated member concludes that an investigation is warranted, it shall take appropriate measures to implement a thorough investigation of the allegations. The Audit Committee shall have the authority to obtain assistance from the Company's management, counsel or auditors, or to retain separate outside legal or accounting expertise as it deems necessary or desirable in order to conduct the investigation.

At each quarterly meeting of the Audit Committee, the Committee will discuss the status of any ongoing investigation and review the resolution of each complaint submitted during the previous quarter, whether or not the complaint resulted in the commencement of a formal investigation.

#### Z.1.2.3 Corrective Action

The Audit Committee is ultimately responsible for determining the validity of each complaint and fashioning, with the input of its advisors and Company management, if requested, the appropriate corrective action. The Committee shall report any legal or regulatory noncompliance to Company management and ensure that management takes corrective action including, where appropriate, reporting any violation to relevant governmental authorities.

Any director, officer, or employee deemed to have violated any law, rule or regulation, or any internal policy regarding accounting standards and disclosures, internal accounting controls, or matters related to the internal or external audit of the Company's financial statements, may be subject to disciplinary action, up to and including termination.

#### Z.1.2.4 No Retaliation.

Employees should feel confident to report violations as described above or to assist in investigations of such alleged violations. The Company will not tolerate retaliation or discrimination of any kind by or on behalf of the Company and its employees against any employee making a good faith complaint of, or assisting in the investigation of, any violation of government laws, rules, or regulations or the Company's Code of Ethics or



internal policies regarding accounting standards or disclosures, internal accounting controls, or matters related to the internal or external audit of the Company's financial statements.

### Z.1.2.5 Retention of Complaints and Documents

The Committee shall retain all documents and records regarding any complaint for a period of seven (7) years.

It is illegal and against the Company's policy to destroy any corporate audit or other records that may be subject to or related to an investigation by the Company or any federal, state or regulatory body.

### Z.1.2.6 Compliance with this Policy

All employees must follow the procedures outlined in this policy and cooperate with any investigation initiated pursuant to this policy. Adhering to this policy is a condition of employment. The Company must have the opportunity to investigate and remedy any alleged violations or employee concerns, and each employee must ensure that the Company has an opportunity to undertake such an investigation.

This policy does not constitute a contractual commitment of the Company. This policy should not be construed as preventing, limiting, or delaying the Company from taking disciplinary action against any individual, up to and including termination, in circumstances (such as, but not limited to, those involving problems of performance, conduct, attitude, or demeanor) where the Company deems disciplinary action appropriate.

This policy in no way alters an employee's at-will employment status with the Company. Either the Company or an employee can terminate the employment relationship at the Company at any time, for any reason or no reason, with or without cause, warning, or notice.

### Z.2 OCCUPATION HEALTH AND SAFETY POLICY AND PROCEDURES

Health and safety of the employees of Treasury Metals is of the highest priority. Health and safety within treasury Metals is evolving and current policy and procedures are summarized below. These procedures are reviewed annually and full versions are available at the Project Office.

### **Z.2.1 Health and Safety Policy**

Treasury Metals is committed to protecting the health and safety of all employees. Safety is a core value and our highest priority in all activities we undertake. Our commitment is based on caring for our employees.

We will work diligently to ensure safe working conditions, equipment and work sites.

We recognize and will continue to support employee involvement in identifying, preventing and eliminating hazards and risks to injury.

### Z.2.1.1 Health and Safety Expectations and Objectives

- All injuries are preventable; every task can be performed without injury.
- Management is accountable for health and safety performance.
- All employees are responsible and accountable for their personal safety.
- Treasury Metals is committed to achieving full compliance with all applicable legal requirements and company standards.
- Promote and develop strong leadership, safe behaviors and personal accountability in health and safety through employee involvement in continuous improvement processes.
- Maintain a workplace free of the effects of alcohol and other drugs of abuse.
- Promote health and safety at work, at home and in our communities.
- Recognize, reward and support excellent safety performance.



### **Z.2.2 Safety Incident Reporting**

#### Z.2.2.1 Context / Introduction

Timely incident reporting is an essential element of improving the safety of company employees. Timely
reporting ensures that the learning's from reported incidents can be quickly communicated throughout the
company for the purpose of preventing recurrence elsewhere. In addition, timely reporting is necessary to
ensure that Senior Management is made aware of Health & Safety incidents.

### Z.2.2.2 Objectives

• This policy defines the expectations for reporting safety incidents. This includes expectations of timeliness and format for reporting, and includes reporting in compliance with jurisdictional legal requirements.

### **Z.2.2.3 Scope**

- This policy applies to all Treasury Metals facilities and office locations.
- The site Health & Safety Leader is expected to implement this policy for their facility, to ensure reporting of safety incidents conform to this policy.

### Z.2.2.4 Policy

- For determination of workplace recordability for any incident involving injury, all safety incidents will be
  assessed against WSIB recordability guidelines. As outlined in Document 15-01-02 of WSIB regulations,
  the Health & Safety (H&S) Leader or their designate should be consulted if questions arise around
  recordability determinations.
- Reporting of recordable incidents should occur according to the following schedule:
  - All level 1 incidents (fatalities, amputations, or incidents where three or more persons are hospitalized) are to be reported to the Company CEO, Vice President Goliath Project and Site Supervisor as soon as possible, but in no case later than within 1 hour of the incident.
    - Facilities are to report to Government Authorities based on provincial jurisdiction requirements.
  - All level 2 incidents (hospitals admits and cases where probable permanent disability occurs)
    must be reported to the Vice President Goliath Project and the Site Supervisor as soon as
    possible, but no later than within 4 hours of the incident.
  - All level 3 & 4 incidents, which are recordable incidents, i.e. those having medical aid, restricted work, or lost time (pursuant to the OSHA regulations), will be reported to the Vice President Goliath Project and Site Supervisor as soon as practical within 8 hours.
    - Communication by phone or email if phone contact is not possible.
- For any incident (recordable, near miss or first aid cases) the site may use discretion on whether to
  communicate company-wide via the *Safety Alert* process. The significance of incidents and the potential
  learning opportunity across the company will be the factors used to determine if a *Safety Alert* is
  warranted. The *Safety Alert* policy should be followed.
  - Initial Safety Alerts must be posted within 8 hours of the incident.
  - Safety alerts may be updated as additional information becomes available.
  - Safety Alerts will only be shared outside the company with the approval of the V.P., Goliath Gold Project.
- The site is required to fully investigate all WSIB recordable incidents to determine root cause(s) and corrective actions.
- The site Safety Leader or the V.P. of the Goliath project is responsible for periodically checking progress on the completion of identified corrective actions on the incident investigation.



The site will formally investigate 'significant' near misses and first aid cases where appropriate.

### Z.2.2.5 Policy Administration

- For information about this policy, please contact the Safety leader or site Manager.
- Treasury Metals reserves the right to amend, delete or add to this policy or to any of its provisions.

### **Z.2.3 Injury Illness Reporting**

### Z.2.3.1 Objectives

• The objective of this procedure is to ensure all incidents involving injury or illness are reported and dealt with in a consistent, timely and appropriate manner.

### **Z.2.3.2 Scope**

This procedure applies to all employees, contractors and visitors to Treasury Metals Goliath Gold Project.

### **Z.2.3.3 Policy**

- Report all injuries and illness immediately to your supervisor.
- Contact Main Office for First Aid trained personnel.
- A first aid report is prepared by Site Supervisors and distributed to Site Safety Leader and Administrative Assistant.
- If medical treatment beyond first aid is required the employee is responsible to have the health care practitioner complete a **fit-to-work form** and report back to their supervisor as soon as possible after treatment. Management will complete a Form 7 if required under the WSIB Act.
- The Company will make the appropriate notifications depending on the severity of the incident (ex. MOL; TML Corporate).
- If a continued first aid plan is required beyond the initial treatment, it is the responsibility of the employee's supervisor to ensure the employee completes the treatment plan.

### **Z.2.3.4 Policy Administration**

- For information about this policy, please contact Human Resources or your Manager.
- Treasury Metals reserves the right to amend, delete or add to this policy or to any of its provisions.

### **Z.2.4 Accident/Incident Investigation**

### Z.2.4.1 Objectives

• To investigate all incidents/accidents in order to determine the cause and what corrective actions need to be implemented to prevent a recurrence.

### **Z.2.4.2 Scope**

This policy applies to all employees and contractors.

### **Z.2.4.3 Policy**

- The following types of incidents/accidents shall be fully investigated:
  - Accidents that result in injuries requiring medical aid.
  - o Accidents that cause property damage or interrupt operation with potential loss,



- o Incidents that have the potential to result in (1) or (2) above, and
- o All incidents that, by regulation, must be reported to MOL, WSIB or other regulatory agencies.

### Z.2.4.4 Responsibilities

- The following is a list of reporting responsibility:
  - o All employees shall report <u>all</u> incidents/accidents to their immediate supervisor.
  - Site Supervisor designate shall conduct initial investigations and submit their reports using the Accident Investigation Form promptly to V.P. Operations.
  - Management shall determine the need for and, if necessary, carry out detailed investigations.
     They shall also determine causes, recommend corrective action, and report to the V.P.
     Operations.
  - The V.P. Operations shall review all Supervisor reports, determine corrective action to be taken, and ensure that such action is implemented.

### **Z.2.4.5 Policy Administration**

- For information about this policy, please contact Human Resources or your Manager.
- Treasury Metals reserves the right to amend, delete or add to this policy or to any of its provisions.

### Z.2.5 Fit for Work

### Z.2.5.1 Objective

• The purpose of the Fit for Work policy is to prevent injuries to employees, contractors and visitors while working or visiting Treasury Metals Inc.

### **Z.2.5.2 Scope**

• This policy covers employees, contractors and visitors working or visiting at Treasury Metals Inc.

### **Z.2.5.3 Policy**

• It is the policy of Treasury Metals Inc. that all individuals on site must be demonstrating behavior that promotes their individual safety and the safety of others. There are no exceptions to this policy due to the safety hazards associated with non-compliance.

### Z.2.5.4 Responsibility

It is the responsibility of each Supervisor, Manager or TML Contact Person (Contractors and Visitors) to
ensure that the persons reporting to them are familiar with this policy before starting the work or visit and
that it is strictly adhered to. It is the responsibility of individuals to understand and follow the Fit for Work
policy

### Z.2.5.5 Communication

This policy will be part of visitor orientation, employee induction and contractor induction process. This
policy will also be communicated to current employees through postings and training process

### **Z.2.5.6 Policy Administration**

- For information about this policy, please contact Human Resources or your Manager.
- Treasury Metals reserves the right to amend, delete or add to this policy or to any of its provisions.



### **Z.2.6 Blood Borne Pathogens**

### Z.2.6.1 Objective

 To minimize employee exposure to blood borne pathogens such as Hepatitis B, Hepatitis C, and HIV, that could lead to disease or death.

### **Z.2.6.2 Scope**

 The Blood borne Pathogens Program applies to all employees and contractors whose duties may reasonably be anticipated to result in occupational exposure to blood or body fluids.

### **Z.2.6.3 Policy**

 It is the policy of Treasury Metals Goliath Gold Project that all mill employees and contractors will conform to a standard blood borne pathogens program

### **Z.2.6.4 Policy Administration**

- For information about this policy, please contact Human Resources or your Manager.
- Treasury Metals reserves the right to amend, delete or add to this policy or to any of its provisions.

### Z.2.7 Slip, Trip and Falls

### Z.2.7.1 Objective

• The purpose of the Slip, Trip and Fall Policy is to prevent injuries to employees, contractors and visitors at Treasury Metals sites.

### **Z.2.7.2 Scope**

- The policy encompasses the processes required for the prevention of slip, trip and falls.
- This policy covers employees, contractors and visitors working or visiting Treasury Metals Inc.

### **Z.2.7.3 Policy**

- The Purpose of the policy is to:
  - To ensure that Treasury Metals sites are safe working environments that is free from slips, trips, and falls to the greatest extent possible.
  - To ensure that appropriate systems are in place so that potential slip/trip/fall hazards are identified;
  - To ensure that risk assessments are completed and that appropriate control measures and/or remedial actions are in place;
  - To ensure that staff/employees are aware of the risks and take appropriate actions to prevent falls.
- There are many reasons while workers fall in the workplace;
  - o Poor lighting,
  - Slippery surfaces,
  - o Poor housekeeping,
  - Unclear work procedures, lack of training, rushing,
  - Equipment that is not available, not used, misused, or in poor condition.
- All Staff/employees are responsible for:
  - o Ensuring that any work they undertake does not create or leave any slip, trip or fall hazards;



- Ensuring all spillages are cleaned up using appropriate methods and using proper signage (wet floor)
- Ensuring other hazards, e.g. defective floor coverings, are appropriately acted upon and reported before going off duty;
- Ensuring that the workplace environment is maintained and kept free from all hazards including slip, trip and fall hazards;
- Supporting improvements to work processes to reduce the risk of slips, trips and falls within the workplace environment;
- Maintain high standards of housekeeping to ensure that all areas are free from potential trip hazards and clutter;
- Ensure that any equipment being used does not present a potential trip hazard;
- If a slip, trip, or fall occurs in relation to a staff member then it shall be reported **immediately** to the Site Supervisor or other member of Management Team. Depending on the circumstance, an incident investigation may be initiated.
- Ensure company staff and contractors are effectively monitored in order to reduce slip trips and falls hazards that may be created by the work they undertake;
- Ensure that appropriate lighting is in working order to reduce the risk of individuals misjudging flooring or not seeing contaminants.
- In order to reduce the incidents of slips, trips and falls; it is the policy of Treasury Metals to provide specific guidelines in regards to work habits which are to be adhered to.
- Proper foot wear is to be worn at all times (open toe/heel shoes are not to be worn)
- Footwear must be in compliance with specific policies and procedures for job attending to.
- All equipment must remain in good repair and NO employee of Treasury Metals is to use equipment that
  is damaged. This equipment must be tagged as "out of service" and the employee
  who noticed the
  defective equipment must notify the Site Supervisor to ensure that it is repaired or replaced as soon as
  feasible.
- It is the responsibility of all TML employees to clean up spills as they occur

### Z.2.7.4 Responsibility

It is the responsibility of each Supervisor, Manager or TML Contact Person (Contractors and Visitors) to ensure that the persons reporting to them are familiar with this policy before starting work.

### **Z.2.7.5 Communication**

This policy will be part of visitor orientation, employee induction and contractor induction process. This policy will also be communicated to current employee's postings and through the departmental training process

### **Z.2.7.6 Policy Administration**

- For information about this policy, please contact Human Resources, Site Supervisor, or your TML Contact.
- Treasury Metals reserves the right to amend, delete or add to this policy or to any of its provisions.

### **Z.2.8 Smoking**

### Z.2.8.1 Objective

 The purpose of this policy is to identify to all employees, visitors and contractors the rules and regulations regarding smoking while in or on Treasury Metals properties.



### **Z.2.8.2 Scope**

This policy covers all employees, contractors and visitors working or visiting at Treasury Metals.

### **Z.2.8.3 Policy**

- Based upon the principles that:
  - Health and safety of people on our site is a primary concern,
  - o Employees are not subjected to unwanted second hand smoke,
  - We treat all people fairly and with dignity and respect, and
  - Mandated by provincial legislation.
- It is the policy of Treasury Metals Inc. that smoking is allowed in outdoor designated smoking areas only.

### Z.2.8.4 Procedure

- Designated Smoking Areas:
  - The only designated smoking areas will be outdoors and must conform to the legislation.
  - These locations must have the area's boundary clearly identified by signs, ropes or chains.
     Proper outdoor receptacles must be provided and will be for the disposal of cigarette butts and other debris associated with smoking such as cigarette packages and wrappings.
  - When establishing smoking area the department must ensure that the location is not in the regular pedestrian traffic path.
  - All outdoor designated smoking areas must be approved by TML Management prior to before being put in use.
  - All outdoor designated smoking areas must be kept clean and free of cigarette butts at all times.
     Smokers within the areas will be solely responsible to keep the area clean.
  - Smoking is not permitted in company vehicles. Smoking is not permitted in personal vehicles on site.
- Exceptions
  - Temporary outdoor designated smoking areas may be provided at large construction sites

### Z.2.8.5 Responsibility

All employees, visitors, and contractors are responsible to follow the rules and guidelines outlined in this
policy and its regulations.

#### **Z.2.8.6 Corrective Action**

 Failure to comply with this policy shall result in corrective action consistent with the principles and procedures in the site Corrective Action Policy.

### **Z.2.8.7 Policy Administration**

- For information about this policy, please contact Human Resources or your Manager.
- Treasury Metals reserves the right to amend, delete or add to this policy or to any of its provisions.

### **Z.2.9 Cell Phone Usage**

### Z.2.9.1 Objectives

To ensure that no person is placed at risk as a result of usage of cellular phones in vehicles. There is a
growing body of evidence that cell phones are a contributing factor in many collisions. Cellular phone
users are four times more likely to have auto crashes that non-users. Cell phone users involved in



crashes are most often talking instead of dialing, are in the striking vehicle, and have struck things in clear view of the driver. Hands-free units offer no safety advantage over hand-held units.

### **Z.2.9.2 Scope**

Policy covers all employees on Company business on or off Company property and to all employees;
 contractors and visitors operating a vehicle while on Company property.

### **Z.2.9.3 Policy**

- Under no circumstances shall a person use a cellular phone while operating a moving vehicle. A person
  using a cellular phone, while operating any vehicle must first park their vehicle in a safe location for the
  duration of the call.
- It is the responsibility of each Supervisor, and Manager to ensure that the persons reporting to them are
  respecting this policy. In the case of contractors and visitors, the primary employee contact on site is
  responsible for ensuring this policy is followed.

### Z.2.9.4 Communication

• This policy will be part of the employee safety induction and contractor safety induction process. This policy will also be communicated to current employees through postings and safety meetings.

### **Z.2.9.5 Policy Administration**

- For information about this policy, please contact Human Resources or your Manager.
- Treasury Metals reserves the right to amend, delete or add to this policy or to any of its provisions.

### Z.2.10 Seatbelt

### Z.2.10.1 Objectives

• The purpose of the Seat Belt policy is to prevent injury to employees, contractors and visitors of Treasury Metals using TML equipment or vehicles equipped with a seat belt and ensure compliance with the Occupational Health and Safety Act Section 25 (2)(h).

### **Z.2.10.2 Scope**

This policy covers all employees, contractors and visitors of Treasury Metals.

### **Z.2.10.3 Policy**

- All persons using vehicles or equipment that is equipped with a seat belt, must wear a seat belt at all times regardless of distance travelled.
- It is the responsibility of each Supervisor and TML Contact Person (contractors and visitor) to ensure that the persons reporting to them are familiar with this policy before arriving on site and that it is strictly adhered to.
- It is the responsibility of the individuals using equipment that has a seat belt understand and follow the Seat Belt Policy.

### **Z.2.10.4 Policy Administration**

- For information about this policy, please contact Site Supervisor or your TML Contact.
- Treasury Metals reserves the right to amend, delete or add to this policy or to any of its provisions.



### **Z.2.11 Drug and Alcohol**

#### Z.2.11.1 Context / Introduction

• Treasury Metals will maintain a healthy and safe work environment by, among other measures, providing a workplace free from the effects of drug and alcohol use.

### Z.2.11.2 Objectives

• The purpose of this policy is to move towards the elimination of safety risks associated with impairment at Treasury Metals.

### **Z.2.11.3 Scope**

 This policy applies to all Treasury Metals employees and contractor employees working at Treasury Metals.

### **Z.2.11.4 Policy**

### Z.2.11.4.1 General Information

Treasury Metals will maintain a healthy and safe work environment by, amongst other measures, providing a workplace free from the effects of drug and alcohol use. The importance of this policy is underscored by the fact that many of our employees work in situations in which an error in judgment or compromised motor skills could result in injury or death. It is therefore critical that our employees remain free from the effects of drug and alcohol use while on duty.

This Policy reflects the dual objectives of ensuring workplace safety and improving employee health. In order to assist in achieving these two objectives, the site has adopted this standard which includes testing employees for the use of drugs and alcohol in specified circumstances.

This Policy is just one aspect of our approach to workplace health and safety, and augments the efforts.

- The following, in addition to any local rules, requirements, policies and procedures, shall apply:
  - Except as described below, employees shall not sell, purchase, deliver or use any controlled or uncontrolled substance (including alcohol) on Company premises or while conducting company business, or at any work related function. (with the exception of possession of sealed containers locked in the trunk or otherwise appropriately secured in a personal vehicle consistent with the Highway Traffic Act) Company or rented vehicles and equipment shall not be operated by any employee under the influence of any controlled substance (including alcohol) or having any controlled substance (including alcohol) in his/her system.
  - Employees shall report for work fit for duty and free from the effects of alcohol or drugs and shall not consume or possess alcohol or drugs during the course of the work day, with the exception of medication that has been prescribed by an employee's physician and is being used in accordance with the prescription. It is imperative that the medication not impair the employee from performing their duties and responsibilities in a safe and efficient manner. Employees have a responsibility to review their job duties with their physician to confirm that use of the medication will not impair their ability to work safely.
  - Employees shall act responsibly and in compliance with all legal requirements at any work related social function where modest consumption of alcohol is permitted.
  - While the primary objective of this policy is to improve the health and safety of employees and while help is provided for those who are affected by drug or alcohol use, failure to comply with this policy may lead to disciplinary action up to and including dismissal.



- This policy is subject to ongoing review, and modifications will be made as deemed necessary to respond to current circumstances and evolving needs.
- Measures to Address Drug & Alcohol Abuse
  - The Site supports a variety of measures to address any situation where drug or alcohol use is or may be affecting an employee's performance, including the following:
  - o At this time Service Canada offers a short term sick-leave plan.
  - Leaves of absence to receive treatment
  - Return to duty agreements
  - Drug and alcohol testing All or some of Safety Certification testing for all safety sensitive positions. Post-Accident, For Cause, Return to Duty and Follow-up testing will be carried out at sites. Decisions regarding scope will be made by the businesses. Standards and process are described below
  - Schedule A Acknowledgement Form.doc
  - Schedule B Commence Return to Duty. Doc
- Fitness to work may be impaired due to various causes, including alcohol, prescription or over-the-counter medications, illicit drugs, illness, and fatigue or stress.
- Employees must ensure that their safety, and that of others, is not adversely affected because they are not fit to work for any reason. Employees in safety sensitive positions should advise their care giver of this standard and that restrictions may apply with regard to the medications prescribed there are often treatment alternatives that care givers can prescribe that will not affect an employee's ability to safely perform his or her job. In any event, any substance which affects motor skills may be inappropriate for use for those employees in safety sensitive positions.
- Responsibility of contractors
  - Contractors who work for Treasury Metals must ensure their employees comply with this standard when working at Treasury Metals facilities. Any violation of this standard by a contractor's employee may result in the employee being removed or barred from Company sites, the contractor being liable for damages to the Company and may even result in termination of the contract.
- Alignment
  - o This standard aligns with the following core policies:
    - Employee Relations, and
    - Health and Safety Risk Management.
- To whom does this standard apply?
  - This policy applies to all Treasury Metals employees and contractor employees working at Treasury Metals facilities.
- Expectation
  - The expectation is that this policy will result in the elimination of safety risks associated with impairment at Treasury Metals.

### **Z.2.11.5 Policy Administration**

- Employees are responsible to comply with this policy. Leaders are responsible to ensure compliance with this policy.
- For information about this policy, please contact your Supervisor.
- Treasury Metals reserves the right to amend, delete or add to this policy or to any of its provisions.



### **Z.2.12 Clothing**

### Z.2.12.1 Objective

• The purpose of the Work Clothing Policy is to prevent injury to employees, contractors and visitors of Treasury Metals and comply with the Regulations for Industrial Establishments Section 84.

### **Z.2.12.2 Scope**

This policy covers all employees, contractors and visitors of Treasury Metals.

### **Z.2.12.3 Policy**

• It is the policy of Treasury Metals Inc. that every employee, contractor and visitor wears sufficient work clothing to protect them from injury.

#### Z.2.12.4 Procedure

 All persons will wear the sufficient work clothing required for each job. This chart illustrates some required controls for particular exposures. Job Safety Analysis, Standard Operating Procedures, and Material Safety Data Sheets have special requirements for work clothing that must be followed.

### Z.2.12.5 Responsibility

• It is the responsibility of the Site Supervisor or TML Contact Person (contractors and visitors) to ensure that the persons reporting to them are familiar with this policy before arriving on site and that it is strictly adhered to. It is the responsibility of each individual to follow the Work Clothing Policy.

### **Z.2.12.6 Corrective Action**

• Failure to comply with this policy will result in corrective action.

### **Z.2.12.7 Policy Administration**

- For information about this policy, please contact Human Resources or your Manager.
- Treasury Metals reserves the right to amend, delete or add to this policy or to any of its provisions.

### Z.2.13 Jewelry

### Z.2.13.1 Objectives

 The purpose of the Jewelry Policy is to prevent an entanglement injury to employees, contractors and visitors at Treasury Metals and to comply with the Regulations for Industrial Establishments 851/90s.83(2).

### **Z.2.13.2 Scope**

This policy covers all employees, contractors and visitors at Treasury Metals Goliath Gold Project.

### **Z.2.13.3 Policy**

• It is the policy of Treasury Metals that every employee, contractor and visitor remove all rings, watches and loose or dangling jewelry prior to working in an area where they would be near a rotating shaft, spindle, gear, belt or any other source of entanglement.



### Z.2.13.4 Responsibility

• It is the responsibility of each Supervisor, Manager or Contact Person (contractors and Visitors) to ensure that the persons reporting to them are familiar with this policy before arriving on site and that it is strictly adhered to. It is the responsibility of each individual to follow the jewelry policy.

### Z.2.13.5 Corrective Action

Failure to comply with this policy will result in corrective action.

### **Z.2.13.6 Policy Administration**

- For information about this policy, please contact Human Resources or your Manager.
- Treasury Metals reserves the right to amend, delete or add to this policy or to any of its provisions.

### Z.2.14 Hard Hat

### Z.2.14.1 Objectives

• The purpose of this policy is to prevent head injury to employees, contractors and visitors to Treasury Metals Inc. and comply with the Regulations for Industrial Establishments Section 80.

### **Z.2.14.2 Scope**

• This policy covers all employees, contractors, and visitors to Treasury Metals Inc.

### **Z.2.14.3 Policy**

• It is the policy of Treasury Metals Inc. that every employee, contractor, and visitor must be aware of this policy and wear the appropriate head protection when required.

### Z.2.14.4 Procedure

- The following areas are designated as hard hat areas and all employees, contractors and visitors entering
  into, passing through, or working in these areas must wear an industrial hard
  hat in the way it is
  intended to be worn.
- The designated hard hat areas or circumstances are:
  - Wherever overhead work is occurring,
  - At Drill location.
  - o Construction Projects [Refer to OHSA 1990; 213/91 22 (1) & (2)],
  - In addition, head protection as specified is required when areas or tasks are identified as requiring a hard hat based on a risk assessment.

### Z.2.14.5 Policy Administration

- For information about this policy, please contact Site Supervisor or your TML Contact Person.
- Treasury Metals reserves the right to amend, delete or add to this policy or to any of its provisions.

### **Z.2.15 Face and Eye Protection**

### Z.2.15.1 Objective

• The purpose of the Face and Eye Protection policy is to prevent injury to employees, contractors and visitors to Treasury Metals Inc., and comply with the Regulations for Industrial Establishments Section 81.



### **Z.2.15.2 Scope**

This policy covers all employees, contractors, and visitors at Treasury Metals.

### **Z.2.15.3 Policy**

- It is the policy of Treasury Metals Inc. that every employee, contractor, and visitor <u>must</u> wear eye and face protection appropriate for the situation while on Treasury Metals properties. Also, all eye and face protection must be removed safely to prevent exposure to the eyes and face from chemicals or foreign materials. (All Safety Glasses should be equipped with side shields)
- Exceptions
  - Eye protection is not required to be worn within offices, control rooms, lunch rooms, meeting rooms or completely enclosed cabs of equipment and vehicles, unless the nature of activity within these areas creates a hazard requiring appropriate PPE.

### Z.2.15.4 Procedure

 All persons will wear the appropriate eye and face protection required for each job. This chart illustrates some required controls for particular exposures. Job Safety Analysis, Standard Operating Procedures, and Material Safety Data Sheets have special requirements for eye and face protection that must be followed.

### Z.2.15.5 Responsibility

It is the responsibility of each Supervisor, Manager or TML Contact Person (contractors and Visitors) to
ensure that the persons reporting to them are familiar with this policy before arriving on site and that it is
strictly adhered to. It is the responsibility of each individual to follow the Face and Eye Protection Policy.

#### Z.2.15.6 Corrective Action

• Failure to comply with this policy will result in corrective action.

### **Z.2.15.7 Policy Administration**

- For information about this policy, please contact your Supervisor or your TML contact person.
- Treasury Metals reserves the right to amend, delete or add to this policy or to any of its provisions.

### Z.2.16 Hearing

### Z.2.16.1 Objectives

• The objective of the Hearing Protection Policy is to prevent injury to employees, contractors and visitors at Treasury Metals and comply with the Regulations for Industrial Establishments, Section139.

### **Z.2.16.2 Scope**

• This policy covers all employees, contractors and visitors at Treasury Metals.

### **Z.2.16.3 Policy**

It is the policy of Treasury Metals that all employees, contractors and visitors to Treasury Metals must
wear CSA approved hearing protection when exposed to noise levels that exceed 85 decibels. Hearing
protection will also be required as posted.



### Z.2.16.4 Responsibility

It is the responsibility of each Supervisor, Manager or Contact Person (contractors and visitors) to ensure
that the persons reporting to them are familiar with this policy before starting the work or visit and that it is
strictly adhered to. It is the responsibility of individuals to understand and follow the Hearing Protection
Policy.

#### Z.2.16.5 Corrective Action

Failure to comply with this policy will result in corrective action.

### **Z.2.16.6 Policy Administration**

- For information about this policy, please contact Site Supervisor or your TML Contact person.
- Treasury Metals reserves the right to amend, delete or add to this policy or to any of its provisions.

### **Z.2.17 Head Phones**

### Z.2.17.1 Objectives

The purpose of the policy is to prevent injury due to the potential distraction created as a result of wearing
inappropriate headphones or ear buds and the inability to hear warnings, emergency sirens, horns or
phones.

### **Z.2.17.2 Scope**

• This policy covers all employees, contractors and visitors working or visiting Treasury Metals Operations.

### **Z.2.17.3 Policy**

- It is the policy of Treasury Metals Inc. that headphones/ear buds must not be worn on company property.
  - o Exception
    - Single piece earplug devices that are associated with the use of a company radios, or
    - Ear muff headsets used for training and tour purposes.

### Z.2.17.4 Responsibility

It is the responsibility of each Supervisor, Manager or TML Contact Person for (Contractors and Visitors)
to ensure that the persons reporting to them are familiar with this policy before starting the work or visit
and that it is strictly adhered to. It is the responsibility of individuals to understand and follow the
Headphone policy.

#### Z.2.17.5 Corrective Action

Failure to comply with this site wide policy shall lead to corrective action.

### **Z.2.17.6 Policy Administration**

- For information about this policy, please contact Human Resources or your Manager.
- Treasury Metals reserves the right to amend, delete or add to this policy or to any of its provisions.



### **Z.2.18 Wearing Hair**

### Z.2.18.1 Objective

• The purpose of the Hair Policy is to prevent injury to employees, contractors and visitors to Treasury Metals and comply with the Regulations for Industrial Establishments Section 83.

### **Z.2.18.2 Scope**

• This policy covers all employees, contractors and visitors to Treasury Metals Inc.

### **Z.2.18.3 Policy**

 It is the policy of Treasury Metals Inc. that employees, contractors and visitors with long hair (shoulder length, or longer) who work in the mining operating environment shall have their hair safely tied up or confined to prevent entanglement in moving or rotating equipment.

### Z.2.18.4 Responsibility

• It is the responsibility of each Supervisor, Manager or TML Contact Person (contractors and Visitors) to ensure that the persons reporting to them are familiar with this policy before arriving on site and that it is strictly adhered to. It is the responsibility of the individuals to understand and follow the Hair Policy.

### **Z.2.18.5 Corrective Action**

Failure to comply with this policy will result in corrective action.

### Z.2.18.6 Policy Administration

- For information about this policy, please contact Human Resources or your Manager.
- Treasury Metals reserves the right to amend, delete or add to this policy or to any of its provisions.

### Z.2.19 Hand Protection

### Z.2.19.1 Objectives

 The hand protection policy is intended to prevent hand injuries to Treasury Metals employees, contractors and visitors.

### Z.2.19.2 Scope

The hand protection policy applies to all employees, contractors and visitors to Treasury Metals.

### **Z.2.19.3 Policy**

- Hand protection must be worn while performing work, unless a pre-task risk assessment indicates
  otherwise. In order to comply with this requirement, employees must have in their possession or have
  access to the proper gloves for the job they are performing. The attached chart indicates glove
  requirements based on exposure risk. Review the MSDS during the pre-task risk assessment to
  determine level of protection when handling specific chemicals.
- Safe knives and cutters are to be used as alternatives to fixed blade knives. These tools include safe
  options such as automatic blade retraction, concealed blades and blade safety guards.
- The use of fixed blade type knives is prohibited on site.



- For the specific task of cutting insulation, a fixed blade type knife has been approved for use. This task
  requires the user to wear cut resistant gloves and cut resistant sleeves on both hands and both arms
  during use and handling. This fixed blade knife must be properly transported and stored in suitable
  holder.
- The use of personal knives is prohibited except for the preparation of food.
- It is the responsibility of all TML contacts to ensure that all contractors and visitors are familiar with this policy before visiting or starting work on site.
- Failure to comply with this policy will result in corrective action.

### **Z.2.19.4 Policy Administration**

- For information about this policy, please contact Human Resources or your Supervisor.
- Treasury Metals reserves the right to amend, delete or add to this policy or to any of its provisions.

### Z.2.20 Footwear

### Z.2.20.1 Objectives

 The protective footwear policy is intended to keep our employees, contractors and vendors safe from foot injury.

### **Z.2.20.2 Scope**

The protective footwear policy applies to all employees, contractors and vendors to Treasury Metals and
is for the purpose of preventing foot injury.

### **Z.2.20.3 Policy**

- Protective footwear, meeting at minimum a CSA Grade 1 class of protection, must be worn at project sites where policy is in place and/or there is risk on foot injury.
- Electrical and Instrumentation worker's protective footwear minimum will, in addition, provide resistance to electrical shock.
- Employees, contractors and vendors working in the field require steel toe boot with 8 inch height.
- It is the responsibility of the Site Supervisor or your TML Contact to ensure that all contractors and visitors are familiar with this policy before visiting or starting work on site.
- Failure to comply with this policy will result in corrective action.
- Exception
  - o Entering or leaving the property from work areas,
  - o Participating in a supervised general Site or Facility tour, and
  - Main office area.
- No open-toed or open-heeled footwear shall be worn when entering or leaving the property or while participating in a supervised general Site Tour.

### Z.2.20.4 Policy Administration

- For information about this policy, please contact Site Supervisor your TML Contact.
- Treasury Metals reserves the right to amend, delete or add to this policy or to any of its provisions.



### Z.2.21 Traffic Control

### **Z.2.21.1 Scope**

 This policy encompasses all Treasury Metals properties and pertains to all employees, suppliers, contractors and visitors to the site.

### **Z.2.21.2 Purpose**

 The purpose of this policy is to ensure the safety of pedestrians and the safe flow of all vehicle and equipment traffic throughout the site.

### Z.2.21.3 Responsibility

- It is the responsibility of all vehicle drivers and equipment operators within the site to obey the posted speed limit, traffic signs and to respect the designated routes for traffic and pedestrians.
- It is the responsibility of all pedestrians to use any designated pedestrian routes for access between site
  access gates, buildings and their work areas and to wear the required PPE when accessing work and
  work areas once at work.
- It is the responsibility of both vehicle and pedestrian traffic to abide by the procedures for accessing restricted areas.
- No one has the right of way vehicles, pedestrians or heavy equipment. All employees are required to
  exercise due care and diligence in the operation of all vehicles on our TML site. Operators of vehicles
  must always be on the alert for pedestrians and be prepared to stop if the pedestrian does not see them.
  Pedestrians must make eye contact with operators of vehicles and ensure there is a mutually clear
  gesture to safely proceed.

### **Z.2.21.4 Policy Administration**

Treasury Metals reserves the right to amend, delete or add to this policy or to any of its provisions.

### **Z.3 ENVIRONMENTAL POLICY**

Treasury Metals is committed to responsible stewardship of the environment. Our key focus is on meeting the company's goals of minimizing environmental impact, efficient use of the resources we consume and conserving natural resources for future generations.

### **Z.3.1 Environmental Commitment**

- Manage our operations to minimize or eliminate impacts on the environment through use of best management practices and the appropriate application of technology.
- Adopt and promote policies specific to protecting the environment.
- Implement measures to ensure the efficient use of resources, energy and materials to minimize environmental impacts through all phases of the operation.
- Ensure compliance with all environmental legislation and regulations.
- Set objectives and put processes in place to continually improve our environmental performance.
- Treasury Metals will curtail operations if necessary to prevent or resolve environmental non-compliance conditions.