

## COMMUNITIES & STAKEHOLDER STANDARD

### PURPOSE

This Standard sets the minimum requirements to identify, and effectively consult and engage people and groups who have the potential to impact or to be impacted by our business activities. Fulfilling these requirements should provide the means for Kirkland Lake Gold (KL Gold) to develop and maintain relationships based on open and honest communications with our stakeholders.

KL Gold recognizes the rights, culture, history and aspirations of Indigenous Peoples. This Standard is intended to define the minimum requirements to engage with Indigenous Peoples, improve understanding around project development, assess and manage potential impacts, and report on our progress.

#### 1. STAKEHOLDER RELATIONSHIPS

##### 1.1. Planning and Design

###### *1.1.1. Stakeholder Identification & Analysis*

- 1.1.1.1. Sites shall use a stakeholder mapping process to identify, analyze, and document stakeholders upon entering a project area.
- 1.1.1.2. Where information cannot be gathered through direct interaction with the stakeholders, Sites shall collect the data, as available and appropriate, from relevant and credible sources.
- 1.1.1.3. Sites shall develop a systematic process to analyze stakeholder risks, conflicts, concerns, complaints and expectations identified during mapping exercises.

###### *1.1.2. Engagement Planning*

- 1.1.2.1. Personnel engaging with stakeholder groups will understand consultation requirements, including local, regional, national, legal and contractual landscape, norms, rules and systems.
- 1.1.2.2. Sites shall document a stakeholder engagement plan that incorporates information from stakeholder mapping and analysis. The plan shall include:
  - A summary of key stakeholder issues, concerns, and interests;
  - A prioritized list of stakeholders to be engaged based on their level of influence and impact;
  - Culturally appropriate engagement mechanisms to be used to address stakeholder issues, concerns, and interests linked to a schedule and frequency;
  - Engagement objectives and measures of success.



- 1.1.2.3. Sites shall develop a set of agreed-upon, cross-functional core messages about Site activity to ensure consistency throughout engagement activities to manage expectations.
- 1.1.2.4. Necessary and relevant Site information shall be identified and made available to stakeholders in a culturally appropriate manner to create an informed engagement process.
- 1.1.2.5. Where marginalized or vulnerable groups are identified, procedures shall be developed and implemented to ensure these groups are engaged to address associated issues and concerns.
- 1.1.2.6. Sites shall develop an authority hierarchy and process to review and approve commitments made on behalf of the Company. The procedure shall be communicated to stakeholders and identify how commitments will be established, formalized and managed.
- 1.1.2.7. Sites shall develop multi-tiered mechanisms in consultation with stakeholders for the identification, tracking, escalation and resolution of local community complaints or grievances.

## 1.2. Implementation and Management

### 1.2.1. *Stakeholder Engagement Plan Implementation*

- 1.2.1.1. Sites shall consider the recommendations of relevant stakeholders during stakeholder mapping.
- 1.2.1.2. Sites shall ensure that representatives from other functions actively participate and lead engagement activities where appropriate to ensure accuracy of communications and improved ability to respond to questions.
- 1.2.1.3. Local community leaders shall be encouraged to play a leadership role in engagement processes, where appropriate.
- 1.2.1.4. Sites shall evaluate the capacity of relevant external stakeholders to engage effectively. Where deemed necessary and appropriate, resources (financial or in the form of expertise, training, or technical/logistical support) shall be made available to external stakeholders to allow them to engage effectively.
- 1.2.1.5. Sites shall develop metrics and other strategies to measure the success of engagement activity and document these measures in an electronic and accessible format.
- 1.2.1.6. Data shall be reviewed by senior management and updated no less than annually or when there is a significant change in operational activity or when external events occur that impact stakeholders.
- 1.2.1.7. Stakeholder engagement plans shall be reviewed by senior management at least annually or more frequently as needed based upon risk and Site socioeconomic complexity. Reviews will evaluate progress against the measures of success and identify any gaps or underperformance and address deficiencies.
- 1.2.1.8. Formal engagements shall be documented and minutes shared with the attendees.



*1.2.2. Expectations, Commitments and Complaints Management*

- 1.2.2.1. Sites shall maintain a commitment register throughout the life of the Site that enables tracking, management, and closure of commitments.
- 1.2.2.2. Where decisions or commitments are made and approved by KL Gold during stakeholder engagement, the commitment shall be entered into the Site's commitment register, and an implementation plan will be developed to ensure that KL Gold's responsibilities are fulfilled.
- 1.2.2.3. Sites shall ensure that commitments made by KL Gold personnel comply with all relevant anti-corruption requirements. The scope of the commitments agreed with community representatives shall be communicated through a collaborative process with identified leaders.
- 1.2.2.4. Sites shall develop and implement a process for identifying expectations and provide a response (positive or negative) to the holders of those expectations in a timely fashion. Where there is likelihood of recurrence, efforts will be made to ensure that the communication plan is applied over the appropriate time frame in a consistent fashion.
- 1.2.2.5. Sites shall maintain a complaint and grievance register throughout the life of the Site that enables tracking, management, escalation (if required) and closure of complaints and grievances. Formal records of submitted complaints or grievances shall be provided to complainants in accordance with Site procedures.
- 1.2.2.6. Sites shall ensure that stakeholders are informed and trained on how to utilize the complaint and grievance mechanisms.
- 1.2.2.7. Sites shall ensure appropriate and routine communication to stakeholders to inform them of the status of closed and pending commitments and complaints.

1.3. Performance Monitoring

- 1.3.1. Sites shall develop metrics and other measures of effective engagement activity and evaluate effectiveness relative to the changing socio-economic environment no less than annually. The parameters and evaluations shall be documented in an electronic and accessible format.
- 1.3.2. Sites shall conduct a knowledge, attitude and perception survey with stakeholder groups identified in the engagement process to determine the level of satisfaction with engagement activities and validate the level of success achieved. Perception surveys will be conducted at least every three years, or more frequently as needed based upon risk and socio-economic complexities.
- 1.3.3. Sites shall review statistics and trends no less than every two years to gauge the effectiveness of engagement, commitment, complaint and grievance management activities in collaboration with external stakeholders.



- 1.3.4. Sites shall ensure that the commitment register is reviewed by Site and regional senior management on a routine basis but no less than annually. Where actions to fulfill commitments are lagging, corrective actions will be undertaken to ensure activities are executed within a set timeframe. Relevant stakeholders will be informed of the status of these activities.
- 1.3.5. Sites shall monitor and report the status of commitments, complaints and grievances monthly to Site and regional management.
- 1.3.6. Sites should develop a formal and defined schedule for Site senior management to engage stakeholders on a range of subjects, including, but not limited to, the complaints and grievance process, progress against commitments and major project updates.
- 1.3.7. Sites shall be audited against this standard to assess performance and ensure compliance with Company requirements.

## 2. INDIGENOUS PEOPLES

### 2.1. Planning and Design

#### *2.1.1. Application of the Indigenous Peoples Standard*

- 2.1.1.1. This standard shall apply if it is determined that Indigenous Peoples, or areas of cultural significance to Indigenous Peoples, are located within the area of influence of the Site or will be impacted by the development and operation of the Site. This determination must be established in consultation with the corporate office and approved by the President & CEO or Executive Vice-President of Corporate Affairs and Social Responsibility (or equivalent).
- 2.1.1.2. Sites shall ensure full understanding of the legal rights, interests and perspectives of Indigenous Peoples in the area of influence and will acknowledge and respect the rights of Indigenous Peoples.
- 2.1.1.3. Sites, where relevant, will conduct Social Baseline studies or Cultural Resource surveys, identifying considerations such as the history, socio-economic context, land use, governance systems, and culture of Indigenous Peoples. Sites will also incorporate a gender analysis within the studies where appropriate. These studies shall be designed and implemented in a participative manner with the Indigenous Peoples.
- 2.1.1.4. Indigenous Peoples shall participate in the design and implementation of studies according to the legal framework of the host country.

#### *2.1.2. Identification of Indigenous Peoples*

- 2.1.2.1. Sites shall develop a stakeholder map, separately or within existing mapping processes, that clearly distinguish Indigenous Peoples from other stakeholder groups.



- 2.1.2.2. Sites shall identify Indigenous Peoples in their stakeholder maps relative to the specific Site context.
- 2.1.2.3. Sites shall determine the capacity of Indigenous Peoples to engage in constructive dialogue, and, if necessary, Sites shall consider support to build their capacity to participate in a dialogue/engagement process.
- 2.1.2.4. Sites shall design and implement an engagement plan specific for Indigenous Peoples utilizing culturally-appropriate and gender-appropriate mechanisms. In locations where Indigenous Peoples are present or could potentially be impacted by the activity, indigenous engagement shall also form part of broader engagement activities with other stakeholder groups.

## 2.2. Implementation & Management

### 2.2.1. *Prior Engagement Activities*

- 2.2.1.1. Exploration, project or mining staff will not enter a specific area recognized as traditional lands of Indigenous Peoples without first engaging in a culturally appropriate manner.
  - 2.2.1.2. Sites shall ensure that Indigenous Peoples are engaged and informed from at an early stage regarding the activities of KL Gold that could potentially affect Indigenous Peoples or cultural Sites and expected timelines.
  - 2.2.1.3. Sites shall present to Indigenous Peoples information regarding KL Gold, relevant facts about the mining process and mining life cycle, non-confidential information on the project, and the project development process going forward. Information should be presented in a clear, easy-to-understand manner. Indigenous Peoples shall be consulted on how often they would like to be informed and be asked to provide feedback on the quality of information presented.
  - 2.2.1.4. Sites shall conduct a specific impact evaluation of the proposed activities on Indigenous Peoples during the design stage in consultation with Indigenous Peoples or their representatives and take steps to minimize impacts and ensure appropriate restoration and accommodation measures have been identified and included in the project design and financial analysis. This study can be a standalone study or incorporated into other impact assessment studies.
  - 2.2.1.5. Sites shall consult with Indigenous Peoples to identify relevant participatory environmental and social monitoring programs for identified impacts.
- 2.2.2. Sites shall be audited against this standard to assess performance and ensure compliance with Company requirements.