



WORKPLACE VIOLENCE, HARASSMENT AND DISCRIMINATION POLICY

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

Workplace violence includes: any act or threat of physical violence, intimidation, or other threatening disruptive behavior that occurs at the work site. It ranges from threats and verbal abuse to physical assaults and even homicide. It includes a statement or behaviour that is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury. It can affect and involve employees, clients, customers and visitors.

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

Workplace Sexual Harassment means:

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

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

The Company encourages reporting of all perceived incidents of workplace violence, harassment and/or discrimination to the appropriate person, including but not limited to any supervisor or member of the Health and Safety Department and/or the Human Resources Department. Complaints will be kept as confidential as practicable. In the event the complainant feels that he or she cannot make a complaint to either of these individuals, the complainant should report the incident to either the Executive Vice President Human Resources, the Corporate Legal Counsel or make an anonymous report through the Company’s confidential whistleblower hotline available 24 hours a day, 365 days a year at **1-800-661-9675** from within Canada and the US.

Every worker must work in compliance with this Policy and the Company’s Code of Conduct and Ethics (the “**Code of Conduct**”) which incorporates this Policy by reference. If the Company determines that an employee’s behavior has violated this Policy, appropriate action will be taken against the offending individual, up to and including termination of employment. Retaliation against any individual for reporting harassment or discrimination and for participating in an investigation or claim of harassment or discrimination is a violation of this Policy and, like harassment and discrimination itself, will be subject to disciplinary action. Acts of retaliation should be reported immediately and will be promptly investigated and addressed. No negative consequences will occur from workers making reports in good faith of incidents of discrimination or harassment. False and malicious complaints of discrimination and harassment (as opposed to good faith complaints, even erroneous if made in good faith) may be the subject of appropriate disciplinary action. Management will investigate and deal with all concerns, complaints, or incidents of workplace violence, harassment and/or discrimination in a fair and timely manner while respecting workers’ privacy as much as possible. All workers and supervisors will receive appropriate information and instruction on the contents of the Policy, program and Code of Conduct which contains more information about how to report incidents.

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

Nothing in this Policy prevents or discourages a worker from filing an application with the Human Rights Tribunal of Ontario on a matter related to the Code within one (1) year of the last alleged incident. A worker also retains the right to exercise any other legal avenues that may be available.

