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1.1.1 ABOUT KIRKLAND LAKE GOLD LTD.

Kirkland Lake Gold Ltd. ("Kirkland Lake Gold" or the “Company”) is a growing gold producer operating in Canada and Australia that produced 974,615 ounces in 2019. The production comes from three high-quality operations: the Fosterville Mine, located in the state of Victoria, Australia; and the Macassa Mine and Detour Lake Mine, both located in Northern Ontario, Canada. Kirkland Lake Gold's solid base of quality assets is complemented by district scale exploration potential, supported by a strong financial position with extensive management expertise. For further information on Kirkland Lake Gold and to receive news releases by email, visit the website at www.kl.gold.

1.1.2 ABOUT THIS REPORT

This is the second year that Kirkland Lake Gold has produced a sustainability report that combines all operations in one global report. The report details Kirkland Lake Gold’s health, safety, environment, governance and social performance for the year ended December 31, 2019. Despite the fact that the Detour Lake Mine was not part of Kirkland Lake Gold at December 31, 2019, we have included it in the report to ensure complete details about our current portfolio. Our intention is to provide this information to help our stakeholders, including shareholders, employees, business partners, government bodies and people in the communities in which we operate, understand how we manage our operational safety, environmental, social and governance risks, and how our systems and performance are evolving.

Unless otherwise stated, all dollar ($) amounts in this report are expressed in United States dollars, consistent with the Company’s financial reporting.

*See Appendix 2 for reserves disclosures*
At Kirkland Lake Gold, responsible mining is central to everything we do. It is part of our culture; it is a key driver of our success. We are pleased to present our second consolidated sustainability report. The 2019 report builds on the progress achieved in our first publication, released last year. Going forward, we will work to further enhance sustainability reporting with our goal being to clearly demonstrate to all our stakeholders that at Kirkland Lake Gold, we Go for Gold Responsibly.

As a company, we believe in workplace safety, diversity and equality and support for professional development. We also believe in effective environmental management in such areas as minimizing emissions and discharge levels and ensuring tailings containment and security. Very importantly, we also provide valuable support to our communities.

Nothing is more important than the health and safety of our workforce, which includes over 3,000 employees. That is why, when faced with the worldwide COVID-19 pandemic early in 2020, we responded quickly and effectively by introducing an extensive list of protocols and either reduced or suspended operations and non-essential work activities where necessary. In the area of safety, our Total Medical Incident Frequency Rate (“TMIFR”), has improved by 100%, averaging to 2.3 in the first half of 2020. Our goal is to reach a TMIFR of better than 1.0, and we are working on various strategies to achieve this goal by 2021.

We have developed policies regarding diversity and inclusion in the workplace, including continuous improvement programs overseen by management and the board. We are committed to doing what we can to address structural and systemic barriers to greater diversity and inclusion in our company and the mining industry.

Turning to the environment, the use of battery electric mobile equipment at our Macassa mine has made it an industry leader among gold miners in minimizing greenhouse gas (“GHG”) emissions, with both our Detour Lake and Fosterville mines also consistently reporting GHG levels lower than the industry average. We also actively promote biodiversity and responsible land use. As an example, we are currently embarking on a comprehensive site rehabilitation program in the Northern Territory of Australia, where we are faced with a legacy of disturbances from over a century of mining.

Water management is an area of particular strength for our company, with Fosterville being a zero-discharge site, and both our Macassa and Detour Lake mines recycling over 90% of the process water. We have also made major investments in tailings safety and management, including the completion of a new tailings impoundment area and thickened tails plant at Macassa in 2019. These new facilities have not only added tailings capacity, they have also increased stability and reduced water usage.

We believe that as members of the communities in which we operate, it is important that we are contributing to the prosperity and sustainability of our local and regional economies. In 2019, our
mines contributed over $772 million to local and regional economies through employment, procurement and community support.

I started by saying that, at Kirkland Lake Gold, responsible mining is central to everything we do. We are very proud of the many initiatives and activities that we carry out in support of the sustainability of our business, which is a key driver of value creation for all of our key stakeholders. Our reporting and communications around responsible mining and sustainability continue to evolve. We have already come a long way, with more improvements to come. We look forward to our next Sustainability Report when we can share with you how much more we have achieved.

Tony Makuch
1.1.4 SUSTAINABILITY

Underlying everything we do is a commitment to sustainable production. Key to this is acting ethically and responsibly from exploration through to mine closure, and being transparent and accountable for our conduct. Operating our mines responsibly and following good governance practices not only provides benefits for Kirkland Lake Gold, but also for the local communities, the broader regions and the countries in which we operate.

1.1.5 WORLD GOLD COUNCIL RESPONSIBLE GOLD MINING PRINCIPLES:

Licence to operate is not a right, it is something that is earned each and every day. In 2019, we committed to implementing the World Gold Council’s (“WGC”) Responsible Gold Mining Principles (“RGMPs”). The RGMPs are a new framework that sets clear expectations for consumers, investors and the downstream gold supply chain as to what constitutes responsible gold mining. As a member of the WGC, Kirkland Lake Gold was among the 200 organizations and experts who participated in the vigorous consultations that led to the creation of the framework. We have committed to implementing the RGMPs and completing an external verification within three years. As a sign of our commitment, we have organized this year’s sustainability report around these principles. Our key initiatives in the areas of corporate responsibility, community engagement and support, as well as environmental protection, will be measured against these principles. We regard this report as a solid starting point and are working diligently to improve both our performance and our reporting in these critical areas of our business.

Governance

1. Ethical conduct: we will conduct our business with integrity including absolute opposition to corruption.

2. Understanding our impacts: we will engage with our stakeholders and implement management systems so as to ensure that we understand and manage our impacts, realize opportunities and provide redress where needed.

3. Supply chain: we will require that our suppliers conduct their businesses ethically and responsibly as a condition of doing business with us.

Social

4. Safety and health: we will protect and promote the safety and occupational health of our workforce (employees and contractors) above all other priorities, and will empower them to speak up if they encounter unsafe working conditions.

5. Human rights and conflict: we will respect the human rights of our workforce, affected communities and all those people with whom we interact.

6. Labour rights: we will ensure that our operations are places where employees and contractors are treated with respect and are free from discrimination or abusive labour practices.
7. Working with communities: we aim to contribute to the socio-economic advancement of communities associated with our operations and to treat them with dignity and respect.

Environment

8. Environmental stewardship: we will ensure that environmental responsibility is at the core of how we work.

9. Biodiversity, land use and mine closure: we will work to ensure that fragile ecosystems, critical habitats and endangered species are protected from damage and we will plan for responsible mine closure.

10. Water, energy and climate change: we will improve the efficiency of our use of water and energy, recognizing that the impacts of climate change and water constraints may increasingly become a threat to the locations where we work and a risk to our license to operate.

1.1.6 SUSTAINABLE ACCOUNTING STANDARDS BOARD

New to our Sustainability Report in 2019 are our first steps in the inclusion of Sustainable Accounting Standards Board (SASB) disclosures and metrics for Metals and Mining. These standards identify financially material sustainability topics and metrics relevant to our industry. We have included these to communicate more clearly with our stakeholders about our sustainable development, in a way that can be more easily compared with other gold mining companies. We recognize that more work is required as we review and understand SASB metrics, develop our disclosures and optimize how information is presented. We will seek to improve continuously as we monitor drivers of ESG risk and opportunity and track best practices. Please find our full climate ledger on page 60 of this report.
2 GOVERNANCE

We believe that strong governance improves corporate performance to the benefit of all stakeholders. Kirkland Lake Gold’s governance practices guide our behaviour and help ensure we act in an ethically responsible manner and uphold our corporate values. We continually review and improve our practices to achieve higher standards of corporate governance.

2.1 OUR COMMITMENT

2.1.1 ETHICAL CONDUCT

Honesty and integrity foster a positive work environment that strengthens the confidence of all our stakeholders. At Kirkland Lake Gold, our reputation as a responsible resource company and good corporate citizen must be maintained if our Company is to grow and prosper. We know that being a good corporate citizen is more than just following the words of the laws and policies that apply to us, but also following the spirit and intent, and setting a clear standard of expectation in all of our activities.

2.1.2 LEGAL COMPLIANCE

Kirkland Lake Gold has a strong track record of compliance and our goal is to meet or exceed all applicable laws, regulations and licenses. In addition, we strive to comply with recognized industry best compliance practices.

2.1.3 CODE OF CONDUCT AND ETHICS

Kirkland Lake Gold promotes a high standard of integrity across the Company as a whole. We actively strive for a culture of ethical business conduct across all of our business units, to promote high ethical and business standards in the gold mining industry.

Kirkland Lake Gold’s Code of Conduct and Ethics (the “Code”) embodies the commitment of Kirkland Lake Gold to conduct business in accordance with all applicable laws, rules and regulations, and high ethical standards. The Code documents the principles of conduct and ethics to be followed by the Company and its employees, contractors, officers and directors in all countries in which we operate.

The Code promotes conduct that reflects honesty, integrity and impartiality that is beyond doubt, including the ethical handling of actual or apparent conflicts of interest. Those who violate the standards in the Code will be subject to disciplinary action, up to and including termination. The Code also protects anyone who in good faith submits a complaint or a concern from retaliation.
The Code has been adopted by the Board and is monitored by the Corporate Governance and Nominating Committee and the Senior Vice President, Corporate Affairs, Legal Counsel & Corporate Secretary (“SVP Legal”). The SVP Legal monitors compliance with the Code by ensuring all directors, officers and employees of the Company receive and become thoroughly familiar with the Code and annually acknowledge their support and understanding of it.

The Board takes steps to ensure that directors, officers and employees exercise independent judgment in considering transactions and agreements in respect of which a director, officer or employee of the Company has a material interest, which includes ensuring that directors, officers and employees are thoroughly familiar with the Code and the rules concerning reporting conflicts of interest. The Company provides annual training on key components and obligations under the Code to its employees and certain third parties.

The full text of the Code can be found on the Company’s website (https://www.kl.gold/about-us/default.aspx#governance) and a copy is included in Appendix 3 of this report.

2.1.4 COMBATING BRIBERY & CORRUPTION

Kirkland Lake Gold is committed to maintaining the highest ethical and legal standards. The Company’s Anti-Bribery and Anti-Corruption Policy outlines requirements that must be observed by all directors, officers and employees of the Company. These requirements include prohibitions against bribing government officials and making facilitation or improper payments.

The Anti-Bribery and Anti-Corruption Policy also provides employees with clarity regarding: giving gifts to government officials; making political or charitable contributions; books and records transparency; internal controls; and the multiple reporting channels that are in place to encourage the reporting of violations or suspected violations of the policy.

The Anti-Bribery and Anti-Corruption Policy can be found on the Company’s website (https://www.kl.gold/about-us/default.aspx#governance) and a copy is included in Appendix 4 of this report.

2.1.5 POLITICAL CONTRIBUTIONS

Kirkland Lake Gold has not made political contributions. If we decide to do so in the future, we will disclose the value and beneficiaries of financial and in-kind political contributions that we make, whether directly or through an intermediary.

2.1.6 TRANSPARENCY

Kirkland Lake Gold publishes our tax, royalty and other payments to governments annually by country and project in accordance with the Canadian Extractive Sector Transparency Measures Act (“ESTMA”). Although Canada is not an implementing country of the Extractive Industries Transparency Initiative (“EITI”), ESTMA provides an equivalent level of reporting to the EITI
Standard. We support the principles of the EITI and will encourage governments to promote
greater transparency around revenue flows, mining contracts and the beneficial ownership of
licence holders.

Kirkland Lake Gold’s aggregate payments in respect of 2019 were:

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<tbody>
<tr>
<td>TAXES</td>
<td>ROYALTIES</td>
<td>FEES</td>
</tr>
<tr>
<td>$189,572,000</td>
<td>$2,350,000</td>
<td>$14,880,000</td>
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The Company’s ESTMA report, including the breakdown of payments made in 2019 by country
and project, can be found on the Company’s website (https://www.kl.gold/our-
business/regulatory-reports/default.aspx) and a copy is included in Appendix 5 of this report.

2.1.7 TAXES & TRANSFERS

Kirkland Lake Gold pays the taxes and royalties required by host country codes, and seeks to
ensure that transfer pricing outcomes are in line with fair business practices and value creation.

2.1.8 ACCOUNTABILITY & REPORTING

Sustainability is integrated and promoted through all facets of our business. We have made
every level of the organization accountable for implementing and maintaining sustainable
operations. Through Board oversight, executive accountability, and operational incentives, and
reporting on sustainability issues, we hope to provide our stakeholders with confidence in what
we are doing.

2.1.8.1 Board Oversight

At the Board Level, there are four committees that have oversight of ESG concerns at Kirkland
Lake Gold: The Health, Safety, Environment and Corporate Social Responsibility (HSE/CSR)
Committee, the Corporate Governance and Nominating Committee, the Audit Committee, and
the Technical Committee. All of these committees report back to the full Board.

The HSE/CSR Committee assesses potential risks related to health, safety, environment and
corporate social responsibility. It also reviews potential improvements to and innovations in best
health and safety practices, and reviews key risks facing the Company with respect to ESG.

The Corporate Governance and Nominating Committee receives and reviews the Company’s
Enterprise Risk Management register to ensure risks are being identified and, where possible,
mitigated. In 2020, the Board made this a priority by mandating a quarterly review. The Corporate
Governance and Nominating Committee also assesses potential risks relating to ethics and
compliance, including applicable legislation, corporate governance best practice guidelines and
proxy advisory guidelines with respect to corporate governance matters. Along with the Audit
Committee, the Corporate Governance and Nominating Committee oversees the Code of
Conduct and Ethics and the Whistleblower Policy.
The Technical Committee assesses potential risks associated with the Company’s technical and operational matters at its mines and all related properties, including any future expansion or development of such properties from a technical, financial and scheduling perspective. The Technical Committee assesses risk with respect to the production forecasts, budgets, life of mine plans, and mineral reserves and resources. In addition, the Technical Committee provides oversight with respect to tailings management facilities, water treatment plants, paste-fill plants, shaft sinking, ventilation, and innovation and business improvements to the operations.

2.1.8.2 Executive Accountability

Executive level accountability regarding sustainability is shared amongst the executives, with key responsibilities residing with the Executive Vice President of Corporate Social Responsibility, the Vice President of the Environment, the Senior Vice President of Technical Services and Innovation, the Senior Vice President Corporate Affairs, Legal Counsel and Corporate Secretary, and the Vice President of Human Resources. Kirkland Lake Gold encourages and supports continuing education for its Board members and executive team to make sure they have the best available information on sustainability issues. During 2019, the senior executive management team participated in an Enterprise Risk Management course led by an instructor from the Institute of Corporate Directors.

2.1.8.3 Operational Accountability

At the operational level, sustainability is woven through the fabric of the Company’s culture. Our employees participate in training, company initiatives, charity events and community organizations, all of which contribute to the sustainability of our operations. These are in addition to the direct accountability measures put in place at the management level.
2.2 UNDERSTANDING OUR IMPACTS

2.2.1 RISK MANAGEMENT

Risk is inherent in mining. Fundamental to risk management is the understanding of the inherent risks facing the Company, what steps are being taken to mitigate such risks, and what level of risk is appropriate for the Company taking into consideration its specific corporate and operational frameworks. Through its oversight and involvement in the strategic planning of the business, the Board is involved in reviewing the levels of risk for the Company.

Following a risk review process involving the full management team, an enterprise risk register of key risks is developed. A senior employee is assigned responsibility for each risk identified. The employee monitors and implements controls to mitigate the risk and reports back to management. The enterprise risk register, along with the relevant mitigation strategies, is presented to and reviewed by the Corporate Governance and Nominating Committee, and the Board, with specific risks being allocated to the various committees, as set out above. The Board has determined that the Corporate Governance and Nominating Committee should review and assess the Company’s enterprise risk register on a quarterly basis at a minimum. This is to ensure risks which had been addressed were being appropriately reviewed and mitigated. Upon review of the enterprise risk register, the Corporate Governance and Nominating Committee will provide an update to the Board. The risk register includes risks related to environmental, social and governance matters. The Corporate Governance and Nominating Committee will perform an additional oversight role to ensure management accountability with respect to managing and mitigating various risks facing the Company.

2.2.2 STAKEHOLDER ENGAGEMENT

Stakeholder engagement is a core element of our sustainable mining process. We are committed to regularly engaging our stakeholders with a view to incorporating their values and concerns into our business activities, including through formal and informal communication and feedback sessions, community partnerships, site visits and tours, sponsorships and community investments. Kirkland Lake Gold is committed to responding to feedback and concerns raised by the Company’s stakeholders. Our goal is to maximize the benefits of mining while minimizing any negative consequences from our activities.

The Company has memorialized its approach to engagement in a Communities and Stakeholder Standard, which sets the minimum requirements to identify, to consult and to 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 to develop and maintain relationships based on open and honest communications with our stakeholders. The Communities and Stakeholder Standard is intended to improve understanding around project development, to assess and to manage potential impacts, and to aid in reporting on our progress.
The Community and Stakeholder Standard can be found on the Company’s website (https://www.kl.gold/sustainability/community-engagement/default.aspx) and a copy is included in Appendix 6 of this report.

2.2.3 DUE DILIGENCE ASSESSMENTS

Kirkland Lake Gold is developing policies, procedures and processes by which we will regularly and systematically conduct assessments to identify human rights, corruption and conflict risks associated with our activities and in our supply chain with the intention of preventing adverse impacts. Where risks are identified, we will work with suppliers to develop a mitigation workplan based on the specific circumstance, which can include regular reporting and audits, supplier due diligence on its supply chain, policies, programs and training.

2.2.4 IMPACT ASSESSMENTS

Kirkland Lake Gold conducts impact assessments at the beginning of major projects that involve substantive environmental components, socioeconomic (including human rights where relevant) and cultural elements. We are developing processes and procedures to ensure that these are periodically updated as we seek to identify and take account of local cumulative impacts. We will ensure that such assessments are accessible to affected communities and include plans to avoid, minimise, mitigate or compensate for significant adverse impacts as appropriate.

2.2.5 RESOLVING GREIVANCES

Kirkland Lake Gold has introduced a Community Feedback Standard to ensure complaints related to our activities can be raised in good faith, without fear of discrimination and retaliation, and that they will be resolved through a structured methodology that is fair, accessible, effective and timely. The Community Feedback Standard includes provisions to ensure that complaints and grievances are tracked and addressed, and the process is monitored for effectiveness and continuous improvement.

The Community Feedback Standard can be found on the Company’s website (https://www.kl.gold/sustainability/community-engagement/default.aspx) and a copy is included in Appendix 7 of this report.

2.3 SUPPORTING LOCAL

We believe in contributing to the prosperity and sustainability of our local and regional economies. Kirkland Lake gold generates significant and enduring economic benefits for the communities in which we operate. We do this by creating long-term employment opportunities and providing competitive wages and benefits; contributing to regional supply chains through the purchase of local goods and services; contributing to government revenues through the payment of taxes and other fees; and making ongoing investments in our community through sponsorships, donations, scholarships and grant programs.
Our operations make substantial and direct contributions to their local and regional economies through ongoing employment, supply chain, government revenue, community sponsorship and grant programs. Our employees and their families also make indirect contributions, that are not measured, by spending their wages buying local goods and services in the communities where they work and live. We also give local students the opportunity to work onsite at our operations during their academic breaks, including 78 students across all our operations in 2019.

2.3.1 SUPPLY CHAIN POLICY

To promote the participation of local workforce and suppliers at the Company’s sites, Kirkland Lake Gold includes commitments in its bid evaluation criteria to encourage contractors to employ and train locally, as well as engage local businesses.

Kirkland Lake Gold has implemented a Supplier Code of Conduct to ensure that contractors and suppliers that work at the Company’s sites, or on the Company’s behalf, have the ethical and business imperative to comply with the Company’s stated values and commitments. The Supplier Code of Conduct will require compliance with the principles outlined in all of the Company’s policies, including the Code of Conduct and Ethics and the Human Rights Policy.

The Supplier Code of Conduct and the Human Rights Policy can both be found on the Company’s web site (https://www.kl.gold/about-us/default.aspx#policies) and copies are included in Appendix 8 and Appendix 9 of this report.
2.3.2 LOCAL PROCUREMENT

In 2019, the Fosterville Mine spent 53% of its total spend in the Bendigo and Victoria area.

In Canada, 74% of the total spend went to businesses in Ontario, with 38% of the total spend being localized to Northern Ontario. The fact that the majority of operational spend occurs in the communities in which the Company operates is a testament to Kirkland Lake Gold’s commitment to procuring goods and services from local businesses and suppliers as much as possible.

2.3.3 MARKET ACCESS FOR ARTISANAL & SMALL-SCALE MINERS (ASM)

None of Kirkland Lake Gold’s operations are impacted by artisanal or small-scale miners (“ASM”). In the event that any of our operations are impacted by ASM in the future, we will support access to legitimate markets for those ASM who respect applicable legal and regulatory frameworks, who seek to address the environmental, health, human rights and safety challenges often associated with ASM activity, and who, in good faith, seek formalisation. We will also consider supporting government initiatives to reduce and eliminate the use of mercury by ASM.
3 SOCIAL

We believe that being socially responsible is essential to Kirkland Lake Gold’s operating and financial success.

The Company has developed a Social Responsibility Policy, which sets forth the following key commitments:

a) to meet or exceed all applicable laws and regulations;
b) to acknowledge all cultural and other human rights relevant to the Company’s operations and ensure that all levels of the workforce understand and respect these rights;
c) to act ethically and respectfully regarding Indigenous rights, cultural beliefs and aspirations;
d) to engage stakeholders with respect to their concerns and values regarding development, operational and closure aspects of mineral projects;
e) to communicate openly and honestly with respect to the Company’s performance in a timely manner; and
f) to integrate social considerations into aspects of the Company’s business decisions and activities.

To fulfil this commitment to social responsibility matters, Kirkland Lake Gold continuously reviews its objectives and targets to identify and manage social impacts, risks and opportunities.

The Social Responsibility Policy can be found on our website (https://www.kl.gold/about-us/default.aspx#policies) and a copy is included in Appendix 10 of this report.

3.1 HEALTH, SAFETY & WELLBEING

The Health and well-being of our workforce is a top priority for Kirkland Lake Gold. We are committed to providing a safe working environment for our employees, contractors, suppliers and stakeholders. We will never compromise on our safety values and empower our employees and contractors to speak up if they encounter unsafe working conditions.

3.1.1 SAFETY

We strive to provide a zero-harm working environment through our integrated health and safety management system. To continuously improve our health and safety performance, we partner with our employees to develop, implement and maintain high standards for working in a safe manner. We also promote healthy lifestyles through appropriate awareness and training. Executive leadership is also held accountable for workforce safety, as part of their compensation is tied to the total medical injury frequency rate (“TMIFR”). In 2019, Kirkland Lake Gold’s TMIFR decreased by 30% from our company wide rate in 2018.
Our goal is to reduce our TMIFR below 1.

Kirkland Lake Gold had zero fatalities in 2019, continuing a successful trend at all of the operations dating back to the time of the first business combinations that created the current Company in 2016.
Regular safety training for our workforces is conducted at all sites, and personal protective equipment is supplied at no cost. During 2019, training was provided to employees in respect of various subject matter, including pre-hospital trauma care, road crash rescue training, responding to mental health issues, cyanide safety and emergency response, and numerous other topics related to health, safety and emergency response. Our full-time employees received an average of 16.4 hours of safety training across the organization. At Detour Lake Mine, our employees received an average of 35.3 hours of safety training in 2019. A minimal amount of Kirkland Lake Gold’s workforce is comprised of contract workers. As of 2019, we do not track their safety training.

<table>
<thead>
<tr>
<th>Workforce Health &amp; Safety</th>
<th>2019</th>
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<tbody>
<tr>
<td>Health, Safety, and Emergency Response Training</td>
<td></td>
</tr>
<tr>
<td>Full-Time Employees (Average Hours)</td>
<td></td>
</tr>
<tr>
<td>Canada</td>
<td>20.8</td>
</tr>
<tr>
<td>Macassa</td>
<td>1.8</td>
</tr>
<tr>
<td>Detour</td>
<td>35.3</td>
</tr>
<tr>
<td>Australia</td>
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</tr>
<tr>
<td>Fosterville</td>
<td>3.9</td>
</tr>
<tr>
<td>Total</td>
<td>16.4</td>
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</table>

Detour Lake Mine is developing and implementing “Skillmine” - a learning and development infrastructure and methodology that presents a blended approach to learning. The Platform uses audio, visual and pictures for the employee to learn. This allows for those with learning disabilities or differences an opportunity to learn in the best way for them, and at their own pace.
3.1.2 SAFETY MANAGEMENT SYSTEMS

Workplace risk is inherent in the mining industry. We have devoted significant efforts to identify and to mitigate these risks in order to provide a safe working environment. In 2019, we improved our risk identification and reporting systems across the organization. While not certified to any particular international standard, we have designed our health and safety management systems to be consistent with internationally recognized good practice, with a focus on continuous performance improvement. We regularly engage with our employees on health and safety issues, training, and the promotion of enhanced employee commitment and accountability, including a fitness for work program which focuses on addressing fatigue, stress, and alcohol and drug abuse.

Building on our progress in 2018, Kirkland Lake Gold has continued to promote our Cardinal Rules across all operations. The Cardinal Rules are the product of a review of industry-wide high loss-potential incidents, and the identification of targeted control procedures aimed at preventing injuries in those cases. The rules represent Kirkland Lake Gold’s commitment to implementing a consistent health and safety culture throughout the organization.
3.1.3 OCCUPATIONAL HEALTH & WELLNESS

Kirkland Lake Gold maintains high standards of occupational health and hygiene by implementing risk-based monitoring of the health of our workforce based on occupational exposures.

Kirkland Lake Gold actively fosters health and wellness in the workplace by offering our employees various social, wellness and recreational programs for themselves and their families.

In Ontario, on-staff health teams, supported by external medical advisors, develop and deliver wellness training for our employees. In Australia, we bring in third parties to provide various training programs and services from time to time. Employees at all operations benefit from reduced membership prices at local fitness centres, and our camps at our remote operations are equipped with on-site fitness facilities.

3.1.3.1 Spotlight: Dressing up a 795 haul truck box for a good cause!

In 2019, Detour Lake Mine took extra efforts to raise awareness and honour those that have been touched by cancer.

In October for breast cancer awareness month, Detour unveiled a pink 795 haul truck box.

Shortly thereafter, another 795 haul truck box sprouted a moustache in support of Movember for men’s health.
3.1.4 COMMUNITY HEALTH & EMERGENCY PLANNING

Among the Company’s core values is to make a positive and lasting impact by contributing to the sustainability and prosperity of the communities in which we operate. We aim to identify and minimize, if not eliminate, significant risks to the health and safety of local people as a result of our activities and those of our contractors. In addition to following international best practices in developing, maintaining and testing our emergency response plans, we will ensure that potentially affected stakeholders have an opportunity to provide input.

3.1.4.1 Spotlight: Macassa Mine wins Kirkland Lake District Mine Rescue Competition

Kirkland Lake Gold’s Macassa team finished first overall at the regional mine rescue competition in 2019. As winners of this competition, the team qualified for the provincial championships.

They competed in a series of mock emergencies that mimic the mining environment, and require participants to assess a critical incident and act accordingly to resolve the complex situation. Components of the mine rescue competition included tests on repairing equipment, first aid and a multiple-choice questionnaire (MCQ). The scores from each component were tabulated along with the performance in the mock scenario to determine the top overall winner from each district. We are proud of the Kirkland Lake Gold team members who won first overall and those individuals who also scored top in their categories:

- Top MCQ went to Kirkland Lake Gold Holt/Taylor mines;
- Top technician award went to Norm Gannon Jr., of Kirkland Lake Gold, Macassa; and
- Rookie of the Year award went to Mathieu Morin, of Kirkland Lake Gold Holt/Taylor mines.
3.1.5 INFECTIOUS DISEASE

In response to the extensive global health risks resulting from the COVID-19 pandemic, Kirkland Lake Gold introduced a number of measures to protect our employees, their families and our communities. Among these measures, we introduced an extensive list of health and safety protocols, largely related to medical screening and social distancing:

- Self-monitoring/assessment of physical condition by all workers, at site or at home
- Self-isolation if symptoms detected, with medical staff to be notified immediately
- Medical screening prior to entry to worksites
- Social distancing at work sites aimed at limiting the gathering of people
- Mandatory masks to be worn in all areas where social distancing is not possible
- Proper hygiene-related practices including frequently washing hands and using hand sanitizer after social interactions
- Increased cleaning and sanitizing of work areas and equipment at all locations, including accommodations and cafeterias at remote sites
- Improved food safety with self-serve options being removed and food being individually wrapped; social distancing measures in dining areas
- Medical procedures for the assessment, testing, isolation, care and transportation of anyone showing symptoms;
- Remote work for all employees able to productively work from home;
- Travel restrictions, with employees avoiding all unnecessary travel and mandatory self-quarantine for anyone returning from international trips, consistent with government policy, and
- Job protection for employees in quarantine or self-isolation due to COVID-19 or those needing to miss work to care for children as a result of school or daycare closures.

3.2 HUMAN RIGHTS

Kirkland Lake Gold respects the rights, cultures, customs and values of the people and communities living near our projects, our employees, and those impacted by our actions. We are committed to improving our systems for preventing human rights-related impacts for all our stakeholders.

In response to a gap analysis review conducted in 2019, the Company determined that, while its operations in Canada and Australia were subject to robust legal regimes protecting human rights, it was nevertheless appropriate to update and publicize a human rights policy (the “Human Rights Policy”) reflecting international best practices, declaring respect for rights, cultures, customs and values of the communities living near the Company’s operations, of our employees, and of those impacted by the Company’s actions. Our Human Rights Policy can be found on our website: https://www.kl.gold/about-us/default.aspx#policies
3.2.1 U.N. GUIDING PRINCIPLES

The Human Rights Policy affirms the Company’s commitment to respecting the International Bill of Rights (which includes the Universal Declaration of Human Rights) and the International Labor Organisation’s Declaration of Fundamental Principles and Rights at Work. It also outlines our support of the United Nations Declaration of the Rights of Indigenous Peoples. Finally, the Human Rights Policy sets forth Kirkland Lake Gold’s position against human rights violations, including the use of child labour and modern slavery, and any iteration of forced labour.

3.2.2 AVOIDING COMPLICITY

Kirkland Lake Gold is committed to taking steps to prevent human rights abuses. We will ensure that human rights are considered within supply chain processes, including procurement processes and contractor on-boarding. We will conduct human rights reviews or human rights impact assessments across the organization and, where relevant, our suppliers, and we will review whether complicity could arise from the Company’s relationships with government entities and businesses.

3.2.3 SECURITY & HUMAN RIGHTS

Kirkland Lake Gold will ensure that security personnel are properly trained and uphold the Company’s commitment to protecting human rights.

3.2.4 CONFLICT

Kirkland Lake Gold does not have operations in conflict-affected or high-risk areas. Our operations do not cause, support or benefit unlawful armed conflict or contribute to human rights abuses or breaches of international humanitarian law.
3.3 OUR PEOPLE

Our people are our most important resource. We know that taking care of our employees is vital to the sustainability of Kirkland Lake Gold. Our culture is to treat all people with respect and dignity.

We employ nearly 4,000 people at our Canadian and Australian operations, and we encourage each and every one of them to contribute to their full potential. As we grow our global operations, we are committed to creating meaningful career opportunities for our team. We focus on building the talent and capacity of our employees and on providing our diverse workforce with the tools and training they need to do their jobs properly and safely.

3.3.1 WAGES & BENEFITS

Kirkland Lake Gold is committed to creating long-term employment opportunities and providing competitive wages and benefits. We seek to provide meaningful career development opportunities by offering training and mentorship. We offer a broad range of benefits to our employees to ensure that they prosper both inside and out of the work environment, including expanded health benefit plans and contributions to pension or other retirement plans. All employees have access to an Employee and Family Assistance Program (EFAP), which provides immediate and confidential help for any work, health or life concern, including issues related to stress, mental health, grief and loss, relationships and family, workplace challenges, work-life balance, addictions, financial guidance, nutrition and well being.

3.3.2 PREVENTING DISCRIMINATION & BULLYLING

Kirkland Lake Gold is committed to providing an equal opportunity and safe work environment. We seek 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). Our Workplace Violence, Harassment & Discrimination Policy can be found on our website (https://www.kl.gold/about-us/default.aspx#policies) and a copy is included in Appendix 11 of this report.

3.3.3 CHILD & FORCED LABOUR

We prohibit child labour, forced labour and modern slavery in our operations and in our supply chains. We are developing processes to improve our monitoring and assessment of the risk of modern slavery occurring in our supply chain.
3.3.4  FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING

Kirkland Lake Gold upholds the legal right of our workforce to associate with others and to join, or to refrain from joining, labour organizations. We support their right to bargain collectively without discrimination or retaliation.

Kirkland Lake Gold finalized an Enterprise Agreement for the Fosterville Mine with the Employee Representative Committee (Australian Workers' Union), which was formally approved by the Fair Work Commission (Australian national workplace relations tribunal) in March 2019, with a nominal expiry date of June 30, 2021.

3.3.5  DIVERSITY

Kirkland Lake Gold recognizes the importance of diversity of culture, age, race, gender, and sexual orientation within its workforce. A multitude of perspectives and diversity of thought has a direct and positive impact on productivity and creativity. This ultimately results in greater success as a business. In 2019, we focused our diversity and inclusion efforts on gender and Indigenous Peoples. We are proud of the success we achieved with these efforts across our operations.

In 2019, Indigenous Peoples made up 21.5% of Detour Lake Mine’s workforce. Kirkland Lake Gold understands that this progress is only part of the effort required. We are working hard to understand how to better support our Indigenous employees while continuing to grow their contributions within our organization.
In 2019, the composition of our Executive team was 15% female. Women occupy several key roles in senior management at Kirkland Lake Gold: Senior Vice President of Technical Services and Innovation, Senior Vice President Corporate Affairs, Legal, Counsel, and Corporate Secretary, and Senior Vice President Business Operation Management Systems.

In 2020 the executive management team will conduct a review of workplace demographics. The goal is to increase overall diversity within the workforce, with particular emphasis on increasing the representation of women, visible minorities and Indigenous People. We will also be rolling out a Diversity, Equality and Inclusion Policy emphasizing our belief that maintaining a high-quality workforce requires keeping equality and inclusion at the core of our culture and ensuring that our employees truly represent the communities we serve.

3.3.5.1 Spotlight: Great Diversity Debate

Representatives of the Company participated in the Gold Industry Group's annual Women in Gold Great Diversity Debate, discussing whether a diversity debate that begins and ends with gender is doomed to fail. Felicia Binks, our Director of Environment and Government Relations for Australia, advocated the position that overuse of gender diversity terms has led to resistance towards engagement, with organisations having a responsibility to correct the imbalance before the term loses its essence. In 2020, Kirkland Lake Gold will be working toward expanding our definition of diversity with a particular emphasis on gender, visible minorities and Indigenous Peoples.
Kirkland Lake Gold believes that equality and a commitment to diversity extends to every facet of the organization. Gender diversity promotes the inclusion of various ideas and perspectives, which ultimately ensures that we are benefiting from the best available talent. We actively sponsor rising women and are working to provide clear pathways, mentoring and experience to build our talent pipeline. We’re doing this to improve our culture, with the expectation that in doing so, we will become a stronger, more successful and sustainable business. To support our workforce, we have actively set out to normalize taking maternity and paternity leave, as well as allowing flexible work and normalizing it across all levels and genders.

We are an equal opportunity employer. We apply equal opportunity principles in compliance with applicable national and local requirements governing recruitment, employment and growth opportunities. Kirkland Lake Gold ensures that all job specifications, advertisements, application forms and contracts are gender neutral and non-discriminatory. Further, we apply our equal opportunity principles when: recruiting and selecting staff; establishing employment terms and conditions; providing employee training; upholding the right of all employees to work in a supportive environment and providing opportunities to gain skills and develop competencies that enable them to pursue a fulfilling career; ensuring discriminatory practices or harassment is not tolerated and that any reported instances are formally investigated with appropriate disciplinary action taken; and expecting all employees, as a condition of employment, to contribute to a discrimination and harassment free work environment.

Currently, women represent 15% of the senior management team. Senior management does consider the representation of women in executive officer positions when making appointments, however, we have not adopted specific targets or quotas with respect to women in executive roles. Candidate recruitment, hiring and promotion takes into consideration a wide variety of factors, including merit, skill sets, background and length of tenure in current role to ensure highly qualified individuals are hired and promoted within the organization. In doing so, gender diversity, albeit important in the decision-making process, is but one factor in the process that aims to hire and promote talented individuals with diverse backgrounds, experiences, and perspectives.
At our Australian operations, we have a women’s leadership group comprised of senior management and representatives of our Australian workforce to focus on issues influencing gender equity in the workplace. The group has representatives from every part of the business and provides feedback on how particular issues impact their groups. For the year ended December 31, 2019, six out of 36 managers at our Australian operations were women and 86 out of 615 non-managers were women. Accordingly, women represented 16.6% of the Company’s management team in Australia and 13.9% of the Company’s non-manager workforce. A copy of our annual report to the Workplace Gender Equality Agency of the Australian Government can be found on our website at (https://www.kl.gold/our-business/regulatory-reports/default.aspx) and a copy is included in Appendix 12 of this report.

At our Northern Territory Operations, as at December 31, 2019 (and prior to suspending activities in 2020) the workforce included 51 women out of a total of 298, representing 17.1%.

At the operational level in Australia we had several initiatives underway in 2019, including establishing a ‘Parents’ room, participating in and funding an awareness campaign and launching the Gender Equity Consultation Kick Off (GECKO). To fully support parents returning from parental leave, our Fosterville operation opened a temporary ‘Parents’ room. In 2020, Fosterville is opening a permanent location in the refurbished Mine Services Building. This space is a multi-use space, which can be used for prayer or as a quiet space. The room and our new procedures are fully compliant with the standards required to meet Employer of Choice accreditation from the Australian Breastfeeding Association. Once ready, we will be applying for that accreditation. To raise awareness of gender equality issues in the broader community, Fosterville partnered in supporting the Australasian Institute of Mining and Metallurgy (AusIMM) International Women’s Day campaign. This included producing a number of articles and presentations that were used across Australia as part of the campaign.

Our Canadian operations established a women’s leadership group comprised of senior human resources management and representatives of our Canadian workforce to facilitate and encourage initiatives to attract and retain women, and to promote mentorship and knowledge transfer from senior employees. Currently, women represent approximately 10% of our Canadian non-managerial workforce, and 9% of our management team. We are working to grow and continue to support our female talent, ultimately ensuring we have the best talent available.

Canadian Workforce Demographics, by Gender Identification:
3.3.7 RAISING CONCERNS

The Company’s Whistleblower hotline provides a confidential mechanism through which employees and others associated with our activities may raise ethical concerns, and anyone raising a concern in good faith is protected from sanction or retaliation under the Company’s Whistleblower Policy and Code of Conduct and Ethics. Whistleblower services are available by email or anonymous toll free telephone calling from all of our locations, and are available in English and French to increase accessibility.

The Company’s policies regarding confidential reporting and information on how to use the confidential mechanism are included in the on-boarding for all new employees and contractors, and is the subject of periodic refresher training for existing employees. Signs with the information on using the Whistleblower hotline are posted in various locations at all sites to ensure employees and contractors can find the information without having to search.

3.4 BUILDING COMMUNITY

Kirkland Lake Gold aims to make a positive and lasting impact by contributing to the sustainability and prosperity of the communities in which we operate. We believe that being socially responsible is essential to our operating and financial success. We are committed to developing relationships based on open and honest communication with our stakeholders and communicating with them in a timely manner. We highly value community engagement and work continuously to maintain our social licence to operate. Our goal is to maximize the benefits of mining while minimizing any negative consequences from our activities.

3.4.1 COMMUNITY CONSULTATION

Our operations regularly engage with community stakeholders in order to incorporate their values and concerns into our business activities. Our engagement programs and activities include formal and informal communication and feedback sessions; community partnerships; site visits and tours; and sponsorships and community investments.

In Australia, we hold quarterly Environmental Review Committee meetings with local government and community representatives. In 2019 we hosted five meetings in the surrounding townships to discuss operational and exploration activities. We also publish a quarterly newsletter to keep the community well informed. We held our annual Fosterville Family and Friends Day, which provided an opportunity to update community members from within the old Fosterville township and beyond.

In Canada, the Macassa Mine annually hosts a Community Open House to provide members of the public with an opportunity to network with our management team, to receive updates on various ongoing projects and to provide their feedback on our activities. At our Detour Lake Mine, we host community site visits and meetings which include a bi-annual family day, Indigenous Elder tours, Chief and Council visits, as well as high school tours. In addition, we have a dedicated community liaison officer who helps manage our community outreach.
We have developed policies and standards to guide our stakeholder engagement and community consultation, which includes documenting implementation and ensuring that feedback mechanisms are in place so that input can be reflected in management decisions and impact assessments. We will develop stakeholder maps and engagement plans at each site to ensure a consistent Company approach.

3.4.2 UNDERSTANDING COMMUNITIES

As part of maintaining our social licence, we welcome community feedback, and we monitor and track any issues raised by local citizens. We have formal grievance mechanisms to ensure any complaints we receive are promptly and appropriately addressed. Complaint registers actively track the assessment, response and resolution of any complaints about our mining activities.

We will ensure that we engage with communities, including traditional leaders, in a culturally appropriate manner, and have implemented appropriate cultural awareness training for employees and contractors. In our engagements we will be alert to the dangers of causing differentially negative impacts on women, children, Indigenous Peoples and other potentially vulnerable or marginalized groups. We will strive to ensure that the voices of these groups are heard and that this knowledge is integrated into how we do business.

3.4.3 CREATING LOCAL BENEFIT

Kirkland Lake Gold’s activities generate significant and enduring economic benefits for the communities in which we operate. We believe in contributing to the prosperity and sustainability of our local and regional economies. We continue to invest in social, educational, environmental and recreational programs that benefit local communities.

Kirkland Lake Gold generally looks to support projects that provide benefit to a significant number of community members or meaningful groups within the communities where the Company operates. A portion of the funding goes towards initiatives that encourage active, healthy lifestyles. Kirkland Lake Gold also sponsors groups, events and facilities to build relationships and have a positive impact on the communities surrounding our operations.

Our community investment budget is flexible from year to year, based on community needs and requests. This allows us to respond and invest in a way that directly benefits communities and with their input. In 2019, Kirkland Lake Gold donated approximately US$1,000,000 in the regions where we operate, to various charitable and not-for-profit organizations.

In Canada, our employees are active volunteers in the community and our operations provide ongoing support for local food drives, health organizations, hospitals and to local curling, golf and other sports and recreational facilities.

Kirkland Lake Gold’s economic contributions to our local and regional economies during 2019 included the following:
3.4.3.1  Spotlight: Community Giving

3.4.3.1.1  Australian Bushfires

The 2019-2020 bushfire season in Australia was a particularly harsh one, burning over 24 million hectares and affecting an estimated three billion terrestrial vertebrates, including some endangered species that may have been driven to extinction. Kirkland Lake Gold donated A$1,000,000 to support impacted communities and their relief and recovery efforts.

3.4.3.1.2  Fosterville Community Grants

Our Fosterville mine is in its 14th year of operating our Community Grants program. The grants are offered twice a year and focus on projects which have strong links and long-lasting benefits to the wider community. Grants are allocated to projects in the arts, education, environment, recreation, and community development areas. In 2019 there were 19 local and regional community groups successful in their grant applications. Over the past 14
years, 211 local community groups have been awarded a total of $332,500. We are proud to be able to support our local community in this way.

3.4.3.1.3 Sponsorship of the Bendigo Blue Light

During 2019 Fosterville Gold Mine formed a two-year partnership with Bendigo Blue Light. Bendigo Blue Light is an organization made up of Victoria Police and local community members who share the common goal of making a difference in the lives of young people. Their programs focus on crime prevention by identifying and addressing the needs of at-risk youth. They provide life skills coaching and opportunities for increased participation in cultural, social, and sporting programs. Initiatives developed in partnership with our Fosterville Mine include:

- Establishment of a Youth Drop in Centre;
- Purchase of a mobile coffee van/juice bar;
- Access to training evenings and workshops;
- Access to boxing programs and gym facilities;
- Mentoring programs.

All these programs are developed with an intention of improving connection with disengaged youth, reducing inequality through improved access to education, funding, and community services and by improving the quality of infrastructure and resources within rural communities. As the partnership progresses Fosterville Gold Mine will also look to assist with mentoring opportunities and potential employment pathways for the youth engaged by the Blue Light programs.
3.4.3.1.4 Supporting Advance Applied Research

We recognize the importance of advancing research and innovation in our region, and were happy to donate $500,000 to support Northern College in launching a new 24,000-square-foot applied research lab through its Innovation Hub. Northern College’s Innovation Hub serves as a prototyping and testing centre for new products, processes, and services, with the goal of making industry more competitive and boosting regional economic development.

We believe that our investments in community-driven organizations and initiatives like those at Northern College represent our shared commitment to improving the quality of life in the areas where we operate.

3.4.4 SEEKING COMMUNITY SUPPORT

Kirkland Lake Gold doesn’t just operate in communities, we are part of the community. We seek to ensure that our relationship with the communities in which we operate, is mutually beneficial. Our Social Responsibility Policy and our Community and Stakeholder Standard set parameters for how we pursue that goal.

Kirkland Lake Gold is committed to positive community engagement, and will regularly report on community engagement activities. We will maintain a system for tracking communications with communities, including any events held and feedback obtained. Where appropriate, we will conduct community perception surveys or similar assessments to determine the level of community support.

Our Community Feedback Standard establishes a system for communities to report concerns and a clear process for responding to individual or collective concerns in a timely manner. On a case by case basis, as necessary, we will document expectations with community leaders and put in place a framework for co-operation and communication.

We are proud that our consistent engagement with community stakeholders has resulted in zero delays across all our operations related to community concerns, stakeholder resistance, political delays or pending regulatory permits.
3.4.5 IN-MIGRATION

The location of our operations has an impact on how we attract and retain employees. At all of our operations, we seek to maximize employment from the local population.

For those of our operations that do not rely on a work camp, if we cannot fill a position from the local population, we look to hire people who wish to establish a home in the area. We do this to avoid temporary population changes and the stress that can cause on community systems, and we work with local authorities and community leaders to minimize any adverse impacts. For instance, within the Town of Kirkland Lake, the Company instigated the construction of several permanent residences so that new personnel could make a home for their families in the Town without disrupting the local real estate market.

Where we operate camp facilities and need to bring employees in from areas beyond the local population centres, we work with community leaders to manage the flow of people to minimize impacts on local infrastructure and systems.

3.4.6 INDIGENOUS PEOPLES

Kirkland Lake Gold values and cultivates our relationship with the Indigenous peoples. This relationship is essential to our continued success as 100% of our reserves, proven and probable, rest on their land. We engage directly with Indigenous communities in both Canada and Australia to foster meaningful and mutually beneficial relationships. We seek to ensure our operations are respectful to Indigenous rights, cultural beliefs and aspirations.

At the Board level, we included an Indigenous component to our Communities & Stakeholder Standard details a process for consulting and engaging Indigenous Peoples that have the potential to impact or to be impacted by Kirkland Lake Gold’s business activities. It provides a framework for each of our operations to develop and maintain relationships based on open and honest communication. In recognizing the rights, culture, history and aspirations of Indigenous Peoples, the Standard prescribes specific requirements for Indigenous engagement. The Standard will ensure that our personnel engaging with Indigenous groups, communities and stakeholders are knowledgeable of regulatory requirements, local cultures and the regional, legal and contractual landscapes. It also sets consistent requirements for research, comprehensive planning and design of engagement plans, detailed tracking and reporting, and measuring performance for continuous improvement.

We have several agreements with Indigenous communities that ensure sustainable benefits are generated from doing business in the community. These agreements provide benefits that include training and education, access for Indigenous businesses to contracting opportunities with the Company, environmental monitoring and information sharing, and access to employment opportunities. We also have a number of initiatives underway aimed at improving the participation of Indigenous persons in job opportunities at our sites. These initiatives help eliminate some employment barriers to entry, as well as improving the lived experience of our current Indigenous employees.
Our Canadian initiatives include the Canadian Aboriginal Women in Mining program and the Aboriginal Young Men in Mining Program. These programs introduce Aboriginal Women and young Men to the mining sector. We offer an offsite course on mining, and then enable some of the participants from the program to participate in a placement at one of our mine sites. The intention is to hire them for full time employment if they are successful and enjoy the role. These programs had another successful year in 2019, with 6 community placement employees, of which 3 were hired for full-time employment.

6
INDIGENOUS COMMUNITY PLACEMENT EMPLOYEES
DETOUR LAKE MINE 2019

3
INDIGENOUS COMMUNITY PLACEMENT PARTICIPANTS HIRED FOR FULL-TIME WORK
DETOUR LAKE MINE 2019

21.5%
INDIGENOUS EMPLOYEES
DETOUR LAKE MINE 2019
We regularly host and participate in local job fairs. Our Community Relations and Human Resources personnel participated in the Taykwa Tagamou and Wahgoshig First Nation Job Fair on July 24, 2019, hosted in Wahgoshig First Nation. We met with members of the community to discuss employment opportunities and answer questions. At our Detour Lake Mine, we have two Indigenous Business Affairs coordinators who keep in regular contact with our IBA partner communities. They are there to be an accessible point of contact to Kirkland Lake Gold, where they can meet with community members, answer questions, and collect resumes. They also track participation rates and provide regular progress reports to the company. We are exceedingly proud to state that 21.5% of our workforce at Detour self identifies as indigenous.

At our Northern Territory operations in Australia, we had tremendous success with an indigenous-identifying open pit rehabilitation crew, who did excellent work backfilling a legacy mine from the 1990’s, proving that we have access to a skilled local workforce. Their work helped eliminate any potential environmental harm from this legacy feature. In addition, they completed the project within 6 months, and did so safely without any injury or incident. Their expertise and skillset are highly valued, and we fully expect to be hiring them back for future rehabilitation projects.

To improve the lived experience of Indigenous Peoples at our Detour Lake Mine, we developed an Indigenous People’s Advisory Committee (“IPAC”). The IPAC delivers a safe platform for our Indigenous workforce to bring forth their questions and concerns in a formal organizational structure that becomes a part of our culture and identity.

3.4.7 CULTURAL HERITAGE

Protecting Indigenous and historical cultural heritage is a key element of our environmental management practices. We conduct archaeological assessments to ensure cultural and heritage rights are protected. We work with Indigenous communities to identify and preserve cultural heritage sites and to incorporate Traditional Knowledge studies where appropriate.

Kirkland Lake Gold has developed and implemented a Cultural Heritage Management Plan (CHMP) for Fosterville in relation to the construction of a new tailings dam, which will be located within 200 metres of an ephemeral waterway (Gunyah Creek). It therefore falls within an area of cultural heritage sensitivity and constitutes a high impact activity, as defined in Australia’s Aboriginal Heritage Regulations.

During the year, Fosterville environmental and geology employees participated in cultural heritage training to raise awareness of Aboriginal Heritage legislation and to learn more about identifying artefacts and sensitive areas. The training was undertaken by the local Dja Dja Wurrung Clan and involved a presentation, followed by a field visit to some nearby aboriginal
cultural sites along the Campaspe River. The field training involved investigating scar trees, rock wells, fish traps, ring trees and rock chips for making tools.

This training initiative is part of Kirkland Lake Gold’s ongoing collaboration with the Dja Dja Wurrung Clan to ensure significant aboriginal sites across its mining lease area are preserved and protected, particularly when planning any new exploration or development work.

3.4.8 RESETTLEMENT

None of Kirkland Lake Gold’s operations have required any resettlement. If at any point it becomes necessary for one of our projects, we will engage in meaningful consultation with affected communities, including a publicly available planning framework, restoration of established livelihoods and the provision of fair and timely compensation. We will seek to minimise adverse impacts on displaced people.
4 ENVIRONMENT

Kirkland Lake Gold is committed to integrating and promoting sustainability into all facets of our business. We recognize that implementing responsible environmental practices and effective management systems is critical to our future success. Therefore, we ensure that environmental responsibility is at the core of how we work.

Our Environmental Policy states we will:

- Meet or exceed all applicable laws, regulations and licenses.
- Develop and maintain a comprehensive and effective Environmental Management System.
- Integrate environmental, social, cultural and economic considerations into our business.
- Foster mutually beneficial environmental partnerships with our communities.
- Conduct business in a manner that minimizes potential environmental impacts.
- Instill a behaviour of responsible environmental performance.
- Continuously improve our management and use of resources through environmentally sustainable exploration, mining, processing, waste management and rehabilitation.
- Communicate openly and honestly about our performance in a timely manner.
- Maintain appropriate and effective communication with our stakeholders.
- Provide for the reclamation and rehabilitation of areas impacted by our operations.

4.1 OUR COMMITMENT TO THE ENVIRONMENT

4.1.1 ENVIRONMENTAL STEWARDSHIP

In order to advance our environmental performance, we have identified seven environmental priorities for our global operations:

- Environmental management,
- Air quality, energy efficiency and greenhouse gas emissions (GHGs),
- Water stewardship,
- Noise abatement,
- Waste management,
- Biodiversity,
- Land and resource management - cultural heritage, and
- Visual amenity, closure and progressive rehabilitation.
We are continuously improving our performance in these areas by developing and implementing environmental management programs and mitigation measures across our organization.

4.1.2 MANAGING ENVIRONMENTAL IMPACTS

Our Environmental Management Plan (EMP) provides a framework to address operational and environmental risks associated with our operations, including an environmental risk register, an environmental effects statement and a monitoring program. This framework helps the Company avoid, minimize, and mitigate adverse impacts on the environment relating to our mining activities.

Fosterville’s environmental review committee meetings are held on a quarterly basis. These meetings include representatives from the community and regulators. Environmental monitoring data is presented, and discussions are held regarding environmental management and mitigation.

4.1.3 TAILINGS & WASTE MANAGEMENT

Tailings are an unavoidable by-product that can pose potential risks to the environment, human health and safety, infrastructure and the future success of the Company. Each of our sites has appropriate waste rock and tailings management plans in place designed to minimize impacts to soils, surface water and groundwater resources. Additionally, general domestic and hazardous waste is disposed off-site by licensed waste management companies. We focus on reducing the volume of waste going to landfill by reducing, reusing and recycling.

In 2019, Kirkland Lake Gold implemented a more rigorous tailings management program, combining the best practices of the Canadian Dam Association (CDA), Mining Association of Canada (MAC) and the Australian National Committee on Large Dams (ANCOLD) for its active and legacy dams to ensure that the Company minimizes risks related to tailings dams.

We participated in the Investor Mining & Tailings Safety Initiative, led by the Church of England Pensions Board and the Swedish Council of Ethics of the AP Funds. We provided detailed public disclosure to the Global Independent Tailings Database, and contributed input on the development of a new Global Standard in Tailings Management.

At the operational level, we have a dedicated qualified (QP) person who oversees all construction, operation, and maintenance of tailings facilities.
### Overview of Kirkland Lake Gold’s Tailings Dam Processes

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<th>Macassa</th>
<th>Detour</th>
<th>Fosterville</th>
<th>Northern Territory</th>
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<td><strong>How often are regulatory safety reviews conducted?</strong></td>
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<tr>
<td>Dam Safety Inspections (DSI) are completed annually.</td>
<td>DSI annually.</td>
<td>DSI annually.</td>
<td>DSI annually.</td>
</tr>
<tr>
<td>The last DSR was in 2016.</td>
<td>DSR and DSI scheduled for 2020</td>
<td>DSR and DSI scheduled for 2020</td>
<td>DSI and DSR scheduled for 2020.</td>
</tr>
<tr>
<td>DSI scheduled for September 2020.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>DSR scheduled for 2021</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| **For each tailings dam, what was the result of the last review?** | | | |
| 2016 DSR showed some stability issues at the Macassa existing facility. | No issues reported | No issues reported | Reports pending, but the Engineer of Record (EOR) reports that imminent failures are highly unlikely |
| An intensive geotechnical review was completed in 2016 and 2017. | | | |
| Downstream buttressing was added between 2016 and 2018. A total of 1.8 million tonnes of rock was placed. | | | |
| 180 pieces of instrumentation were installed, including: Slope indicators, piezometers, ground water wells. | | | |
| We constructed a new facility (NTSF) in 2018 and 2019. | | | |
| Macassa’s existing facility was decommissioned in the fall of 2019 and tailings now goes to the NTSF | | | |
### Please outline the real-time monitoring systems that are in place at each tailings facility

<table>
<thead>
<tr>
<th>System</th>
<th>System</th>
<th>System</th>
<th>System</th>
</tr>
</thead>
<tbody>
<tr>
<td>Piezometers, slope indicators (inclinometers) ground</td>
<td>Piezometers, slope indicators (inclinometers) ground</td>
<td>Piezometers, slope indicators (inclinometers) ground</td>
<td>None</td>
</tr>
<tr>
<td>water wells</td>
<td>water wells</td>
<td>water wells</td>
<td></td>
</tr>
</tbody>
</table>

### What raising method is used at each tailings dam?

<table>
<thead>
<tr>
<th>Dam Type</th>
<th>Dam Type</th>
<th>Dam Type</th>
<th>Dam Type</th>
</tr>
</thead>
<tbody>
<tr>
<td>Macassa’s existing dam used upstream construction. We added downstream</td>
<td>Centerline</td>
<td>Centerline</td>
<td>Historic information is difficult to locate so geotechnical investigation will indicate which method was used.</td>
</tr>
<tr>
<td>buttressing to address stability issues.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>NTSF is downsteam construction</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Are any safety or monitoring upgrades anticipated to be undertaken at any of the tailings facilities in the next 3 years? If so, please elaborate.

<table>
<thead>
<tr>
<th>Facility</th>
<th>Facility</th>
<th>Facility</th>
<th>Facility</th>
</tr>
</thead>
<tbody>
<tr>
<td>NT operations manage 18 dams, including tailings facilities and water</td>
<td>This cell will be decommissioned in the fall of 2020.</td>
<td>Seepage collection upgrades being installed 2020/2021. OMS is updated annually.</td>
<td>NT operations manage 18 dams, including tailings facilities and water dams. Many have not been actively used and as such have not had any reviews completed for many years prior to the scheduled DSI and DSR in 2020.</td>
</tr>
<tr>
<td>dams. Many have not been actively used and as such have not had any</td>
<td>We are currently constructing Cell 2.</td>
<td>OMS is updated annually.</td>
<td>An extensive geotechnical investigation will take place over 2020 to 2022, under the supervision of a newly appointed EOR, and will direct remediation efforts.</td>
</tr>
<tr>
<td>reviews completed for many years prior to the scheduled DSI and DSR in</td>
<td>This construction will include installation of all instrumentation.</td>
<td></td>
<td>The EOR will also produce an OMS, including monitoring and internal inspection requirements.</td>
</tr>
<tr>
<td>2020.</td>
<td>OMS is updated annually.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Operation, Maintenance, and Surveillance (OMS) is updated annually</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
### Waste & Hazardous Materials Management 2019

#### SASB EM-MM-150a.1 Tailings Waste

<table>
<thead>
<tr>
<th></th>
<th>Total Weight (t)</th>
<th>Amount Recycled (t)</th>
<th>Percent Recycled (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(Tailings to basin)</td>
<td>(Tailings to Paste)</td>
<td></td>
</tr>
<tr>
<td><strong>Canada</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Macassa</td>
<td>361,231.06</td>
<td>59,612.54</td>
<td>0.171%</td>
</tr>
<tr>
<td>Detour</td>
<td>33,966,254.35</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td><strong>Australia</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fosterville</td>
<td>507,976.00</td>
<td>0</td>
<td>0%</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>34,835,461.41</td>
<td>59,612.54</td>
<td>0.171%</td>
</tr>
</tbody>
</table>

#### SASB EM-MM-150a.2 Mineral Processing Waste

<table>
<thead>
<tr>
<th></th>
<th>Total Weight (t)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Canada</strong></td>
<td>1,087.84</td>
</tr>
<tr>
<td>Macassa</td>
<td>38.01</td>
</tr>
<tr>
<td>Detour</td>
<td>1,049.83</td>
</tr>
<tr>
<td><strong>Australia</strong></td>
<td>59.00</td>
</tr>
<tr>
<td>Fosterville</td>
<td>59.00</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>1,146.84</td>
</tr>
</tbody>
</table>

#### SASB EM-MM-150a.3 Number of tailings impoundments

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Canada</strong></td>
<td>8</td>
</tr>
<tr>
<td><strong>Australia</strong></td>
<td>8</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>16</td>
</tr>
</tbody>
</table>
4.1.3.2 Case Study – Detour Lake Mine Tailings Revegetation Trial

A Tailings Revegetation Trial was created to assess various methods for the reclamation of final tailings surfaces, particularly the Detour Lake Mine Tailings Management Area (DMTMA) Cells.

In 2019, experimental units (known as mesocosms) were established to test various native plant species and soil amendments when applied to tailings collected directly from DMTMA Cell 1. Fertilizer, mine till, peat, combinations of the three, as well as a combination of mine till and biosolids were applied to mesocosms filled with beached tailings. Each mesocosm was then seeded with a native seed mix and planted with native coniferous and deciduous species, many of which were grown from seeds harvested directly from the natural areas on the Detour Lake Mine site.

Key information that will be gathered from this trial includes the efficacy of various soil amendments, the establishment and long-term stability of native plant communities, and information on potential plant uptake of metals. The latter may be used to assess whether vegetation grown on tailings is safe for consumption by humans and animals.

4.1.3.3 Case Study – Responsible Consumption and Production

At Fosterville, improvements have been made year after year on diverting waste from landfill to recycling facilities. In 2019, we launched a site wide environmental awareness program consisting of monthly presentations by the environment and community team on proper waste disposal, identifying opportunities for recycling and waste reduction, in addition to various other environmental concerns including dust, noise and water. These presentations occurred at “toolbox” meetings across the site to each department and some major contractors. This allows every level of employee to better understand our impacts on the environment and how to work toward a more sustainable future.

Since 2016, there has been a 318% increase in comingle recycling collected from our site, diverting waste from landfill. We owe this success to our strong awareness program as well as increasing the number of recycling bins across the site, with the aim of matching them to all the general waste bins.
4.1.4 CYANIDE & HAZARDOUS WASTE

Cyanide is a chemical compound used in gold mining because it easily combines with gold allowing it to be separated from its ore. This occurs in the leaching process, where the gold ore is mixed with a sodium cyanide solution in large tanks. Because cyanide is toxic and can result in substantial environmental impacts and public health risks if released into the environment, it is important that proper precautions are taken when transporting, storing and using cyanide.

The International Cyanide Management Code For the Manufacture, Transport, and Use of Cyanide In the Production of Gold (ICMC) was developed as a best practice by a multi-stakeholder steering committee under the guidance of the United Nations Environmental Program and the then-International Council on Metals and the Environment. The Detour Lake Mine has been certified under the ICMC. At our other mines, the transport, storage, use and disposal of cyanide are in line with the standards of practice set out in the ICMC, notwithstanding that the sites have not been certified.

4.1.4.1 Case Study - ASTER treatment plant

To improve the overall sustainability of the Fosterville site, we started construction of an Activated Sludge Tailings Effluent Remediation (ASTER) plant in 2019. The purpose of the ASTER plant is to degrade cyanide in water produced through the leaching process.
The ASTER plant degrades cyanide using several bacteria species, which are kept warm and fed phosphate and molasses by the plant. Once the water goes through the treatment process it will be suitable for reuse on site through the processing plant.

This will reduce the amount of recycled water consumed by the Epsom water treatment plant, allowing the recycled water to be made available for other higher level uses. In addition, the ASTER plant decreases the need to evaporate and store excess leach water which improves overall sustainability of the site by reducing environmental risk.

4.1.5 MERCURY

None of our mine sites produce mercury and there is no risk of mercury being released into the surrounding environment. We support the World Health Organization’s (WHO’s) Minamata Convention which is designed to raise awareness about the public health issues related to this naturally occurring element.

4.1.6 NOISE & DUST

Kirkland Lake Gold is committed to avoiding and mitigating impacts on our local communities and the environment arising from dust, noise, blasting and vibration. We have implemented specific policies and practices at all of our sites to achieve this goal.

Reducing the amount of dust and other particulates in the air related to our mining activities has been identified as a priority issue for our community stakeholders. Kirkland Lake Gold closely tracks air quality levels for both dust emitted to the air from its processing facilities (called “high-volume” dust) and dust deposited in the environment (called “depositional” dust) that surrounds its facilities. In 2019, Kirkland Lake Gold began developing a Company-wide continuous air quality monitoring program, based on the success the Company experienced at the Fosterville Mine. Units simultaneously monitor fine and heavy particulates (PM2.5 and PM10) allowing us to investigate any increase in high volume dust occurrences during the year. With the new monitoring program in place, the operations are able to immediately investigate any spikes in dust levels, determine if they are related to the Company’s operating activities, and quickly take any necessary corrective actions.
Number of Air Monitoring Stations:

<table>
<thead>
<tr>
<th>Location</th>
<th>Stations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fosterville</td>
<td>11</td>
</tr>
<tr>
<td>Macassa</td>
<td>6</td>
</tr>
<tr>
<td>Detour</td>
<td>8</td>
</tr>
</tbody>
</table>

At Fosterville, 11 air quality monitoring stations track depositional dust around the site to determine the ash content in dust levels that can be directly attributed to mining activities; while two High Volume Air Samplers (HVAS) monitor ambient air quality, high-volume dust and particulate levels in the air. To mitigate the impacts of dust at Fosterville, we apply a dust suppressant to tailings areas to limit any fine particles of dust becoming airborne during periods of high winds. A similar suppressant is added to a hydro seeding mix and applied to an historic tailings area to reduce the surface area exposed to erosion and to promote vegetation coverage and growth in the long term. Fosterville has bunded the Run of Mine (ROM) area to provide a wind break to further suppress dust from becoming airborne.

The Macassa Mine’s monitoring activities include two HVAS and four dust fall collection Jars. Dust mitigation and prevention at our Macassa Mine involves dust suppression, visual inspections (weekly during dry season), source mitigation, and ongoing rehabilitation to avoid dust erosion. Macassa uses straw at the tailings storage facility to reduce impaction and saltation of the area. To manage dust from our roadways, Macassa applies calcium chloride and magnesium chloride to the surface which effectively dampens the road preventing excess dust. This process is coupled with watering the roads to manage the amount of airborne dust at Macassa Mine.

Detour Lake Mine has eight air monitoring stations, two of which are used for regulatory reporting and statistical analysis. Detour’s mitigation strategy includes chemical dust suppressants to reduce the impact of dust on the environment and to the local community.
噪音和振动是运营黄金矿井的不可避免结果。我们的Macassa和Fosterville运营位于基尔克兰湖和本迪戈社区附近，所以我们减少来自我们的场地的噪音和振动量对我们的社区利益相关者很重要。我们把噪音标准纳入我们的设计和扩展活动，并定期监测我们的活动以最小化对员工和当地居民的影响。我们承诺保持我们本地社区对我们的爆破活动的了解。

在Fosterville，我们每周在矿场周围九个地点进行定期噪音监测。在2019年，Fosterville进行了566次噪音监测，只有3次违规。

爆破是采矿过程的重要部分，并用于露天和地下开采。我们有四个连续爆破计数器，可以捕获开发爆破的信号，同时监测爆破。

基尔克兰湖金业为Fosterville矿场设有爆破通知系统，作为我们承诺向社区利益相关者报导我们的活动的一部分。该系统将在指定的放炮期间提供24小时通知，当他们可能会感觉到地面振动，即6:30至7:00 am或6:30至7:00 pm（虽然开发爆破放炮可能在其他时间进行）。我们通过多种渠道通知社区利益相关者，包括社交媒体。这确保信息易于获取并可用于社区成员。

基尔克兰湖金业在指定地点安装的井下监测器（地震计）监测地面振动。这些传感器测量峰值粒子速度（PPV）以mm/s为单位，并提供用于确保我们的矿场符合我们的许可和许可中的振动限制的数据。

为了更好地了解在Macassa 4号井施工期间产生的噪音，我们于2019年完成了为期8周的噪音监测计划。这个计划包括在4号井废石坑附近的水坝上安装的连续噪音记录器。这与一周的监测计划相吻合，该计划监测了4号井井架、岩面和高速公路，其中在4号井井架和地面之间放置了连续噪音记录器。该计划的成果将用于设计表面基础设施和将要用于生产时的运营过程，以最小化我们活动产生的噪音。
4.1.6.1 Case Study - Acoustic Camera Assessment

Noise is a key concern for the Bendigo community, where our Fosterville Mine is Located. As a result, we strive to minimize our noise and vibration impact. To better understand how noise effects the community, we engaged external consultants AECOM to complete an acoustic camera assessment throughout the Fosterville Processing Plant.

An acoustic camera was used to visualise noise emissions from the Processing Plant. The acoustic cameras were strategically placed at key noise source locations throughout the plant. Key noise sources were identified, then used to create a computer model to determine which noise sources are contributing to the noise levels at nine nearby residences.

The following Processing Plant items were identified as the major contributors to the noise emissions received at the closest sensitive receptors:

1. Primary Crusher (only during day/evening periods)
2. Biox blowers
3. SAG mill

The Primary Crusher was identified as the loudest noise source in the Processing Plant, however operational controls, such as limiting night-time operations, reduce the overall impact of the Primary Crusher on noise emissions during the night-time hours, such that the BIOX blowers and SAG mill are the main contributors to noise emissions at night. Night-time is the most critical time for the operation, when noise limits are the most stringent and conditions (weather, temperature) are conducive to noise propagating, therefore, prioritising mitigation of the Biox blowers and SAG mill is expected to provide the greatest reduction of noise from the Processing Plant.

Specific noise attenuation for the BIOX blowers was designed and budgeted for installation in 2020, and other recommendations from the study will be investigated and discussed with the Noise Abatement Working Group to determine if these can be progressed in the near future.
4.2 RESPECTING THE LAND

We will work to ensure that fragile ecosystems, habitats and endangered species are protected from damage, and will plan for responsible mine closure.

4.2.1 BIODIVERSITY

Our approach to biodiversity is to ensure, at a minimum, that there is no net loss of critical habitat. Where opportunities arise to do so, we will work with others to produce a net gain for biodiversity. We will incorporate both scientific and traditional knowledge in designing adaptation strategies in ecosystem management and environmental assessment.

We monitor and help preserve local biodiversity by conducting regular studies and updates on aquatic life, species at risk, breeding birds, and animal and plant life. We also integrate best practices in land use planning and conservation into our operating activities in order to minimize our impact on the local environment.

Wildlife is abundant in northern Ontario around our mining operations. The Macassa Mine security team annually offers a wildlife safety training course to employees, instructing them on how to avoid and what to do should they encounter any large wildlife species such as deer, moose and bears. The Macassa team also regularly captures and releases smaller wildlife roaming on or near the mining site. When necessary, the team also removes unsafe relic bird nests to avoid repeat nesting in unsafe local nesting areas.

The Detour Lake Mine is located in the Canadian Shield surrounded by forest, ponds, lakes, and muskegs. The region is home to large mammals including caribou, moose, wolf, bear, and fur bearing animals such as lynx, beaver, fox. It is also home to nine species identified as threatened by the International Union for Conservation of Nature (IUCN). Of these species six are on the IUCN list of least concern including: the little brown myotis, the common nighthawk, bald eagles, barn swallows, lake sturgeon, and the bank swallow. Two species are identified on the IUCN vulnerable list: the olive-sided Flycatcher and the rusty blackbird.

![77%](image)

Reserves in or near protected conservation status or endangered species habitat

KIRKLAND LAKE GOLD 2019
Acid Rock Drainage
SASB EM-MM-160a.2

<table>
<thead>
<tr>
<th>Mines where predicted to occur (%)</th>
<th>KIRKLAND LAKE GOLD</th>
<th>2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mines where actively mitigated (%)</td>
<td>KIRKLAND LAKE GOLD</td>
<td>41%</td>
</tr>
<tr>
<td>Mines where under treatment or remediation (%)</td>
<td>KIRKLAND LAKE GOLD</td>
<td>0%</td>
</tr>
</tbody>
</table>

4.2.1.1 Case Study: Woodland Caribou

The Detour Lake Mine is located within the Kesagami Woodland Caribou Range which is home to a protected caribou population. The Company has invested in caribou research since 2013 and was a Gold sponsor at the North American Caribou Workshop. We are actively working with government, forestry, Indigenous communities, academics, and environmental organizations to prepare an overall benefit plan which would include both short-term and long-term measures for local caribou habitat creation and restoration.

4.2.2 WORLD HERITAGE SITES

Kirkland Lake Gold does not currently mine and will not explore or seek to develop new mining operations in areas designated as World Heritage Sites.

4.2.3 LAND USE & DEFORESTATION

In determining our project footprint, we will give meaningful consideration to the land access needs of nearby communities and to the preservation of biodiversity by undertaking appropriate assessments and demonstrating how the results have been taken into account. We will aim to minimise deforestation arising from our activities and will develop plans for reforestation of appropriate areas as part of the rehabilitation of mine sites. Whenever possible, we will look for previously impacted areas for further development rather than unimpacted greenfield sites.
4.2.3.1 Case study - Drain improvements and erosion prevention trial

At Fosterville, to mitigate the impacts of our operations on the surrounding land, we made significant improvements to our drainage system and trialled a new methodology. These diversion drains are essential in allowing clean stormwater run-off to flow downstream, unimpacted by our operations, to community members, agricultural users and into the environment.

While this drainage system is beneficial, it does have an unintended consequence on the land. Soil at Fosterville is dispersive and therefore susceptible to erosion. During heavy rainfall these drains can transport large volumes of water, increasing erosion. In 2019, we focused on minimizing this problem on the northern diversion drain. The drain was reshaped to remove small twists and turns, which were prone to erosion. Then the outer walls of the main bends were lined with rock armouring and rock walls were installed within the drain itself, to reduce the velocity of the flow of water. Hydroseeding was applied along the remaining length of the drain that stabilized the upper walls.

In the final stage of improvements, a new method was trialled on the area immediately after the pipe culvert, which had been eroding outwards at the edges despite our previous efforts to mitigate it by lining it with rock. This new method initially excavated the existing rock and soil from the eroded areas and then a non-dispersive soil layer was installed and compacted. A geofabric layer was then placed on top of the soil prior to the rock armouring. Shaping was also used to create a plunge pool to control the turbulence created from the pipe culvert and minimise water being directed outwards and washing out the banks.
Moving forward, we will monitor the results of this trial method to determine if it was success and can therefore be applied to other areas susceptible to erosion, such as rehabilitated waste dumps.

4.2.4 MINE CLOSURE

We proactively and progressively rehabilitate our mining sites to ensure their long-term stability and visual amenity. We work to return the land to some degree of its former state, planting hectares of native seeds and vegetation and monitoring our sites to ensure we are meeting our long-term rehabilitation objectives. Progressive rehabilitation is an ongoing focus for all of our properties. Each year, an allocated budget is put towards rehabilitating the lands in and around Kirkland Lake Gold’s properties.

We prepare complete closure plans for each site, with a level of detail dependent upon the stage of mine life. Where appropriate, we consult with authorities, the workforce, affected communities and other stakeholders to ensure social and environmental aspects are incorporated in the closure plans. Closure plans identify approaches for the preservation of water sources and the prevention of acid rock drainage and potential metal leaching as required. Budgets and balance sheet provisions for planned closure and post-closure financial commitments are established at the start of a project and regularly reviewed.

At the Fosterville Mine, we are undertaking a biosolids trial on a rehabilitated in-pit tailings facility to assess whether biosolids could support the growth of pasture and other plants. The current trial covers over three hectares, and the area has been seeded with selected species in conjunction with community and other representatives that sit on the mine’s Environmental Review Committee. Monitoring is ongoing to assess the success and rate of plant growth and determine whether biosolids are safe and suitable for future agricultural use and rehabilitation purposes.
We also annually monitor and assess whether the local landscape and ecosystems around Fosterville are functioning properly on key areas of the mine site that have been rehabilitated. If they are not, the Landscape-Ecosystem Function Analysis determines how they can be properly rectified.

At our Detour Lake Mine, we began a 10-hectare reclamation trial in 2019. This trial was developed with input from our Indigenous community partners, who surveyed local land users. This trial will evaluate slope stability, cover material, thickness and various vegetation options used for reclamation process.

In 2019 we completed work reinforcing the existing Macassa Tailings Storage Facility ("Old TSF"), which has reached the end of its planned usage, in preparation for closure. In all, nearly 1.8 million tonnes of rock was placed to support the dam walls. The Company also used deep soil mixing for further stability – one of the first applications of this technique to an existing tailings facility. We have stopped depositing tailings in the Old TSF and it is now ready to proceed to full closure and rehabilitation.
When Kirkland Lake Gold merged with Newmarket Gold in 2016, we inherited numerous old pits in the Northern Territory of Australia that had been mined out and allowed to fill with water. In some cases, the stored water has become acidic over time and poses risks to the environment. In 2019, we undertook to start remediating some of these environmental legacies, beginning with a pit referred to as Chinese 2 (named in reference to Chinese workers brought to work the area during the initial gold rush), which hasn’t been mined for over 25 years. The aim is to return the Chinese 2 pit void to a natural landscape stimulating the return of natural vegetation and preventing off-site damage from runoff and leachate.

The Chinese 2 pit was dewatered and then backfilled by layering and compacting potentially acid forming (PAF) and non-acid forming (NAF) materials in an alternate pattern, aiming to reduce acidic and metallic drainage (AMD). The top NAF layer (capping layer) consists of 300mm of screened and lime treated fines to minimise porosity. Unscreened NAF layers function to absorb and retain groundwater, and the screened NAF layer functions as a sealing layer to prevent vertical transfer of water.
In all, over 750,000 tonnes of material was backfilled into Chinese 2 pit, which was then covered with soil and seeded to encourage a natural landscape.

4.3 UNDERSTANDING OUR FOOTPRINT

Kirkland Lake Gold is committed to improving the efficiency of our use of water and energy, recognising that the impacts of climate change and water constraints may increasingly become a threat to the locations where we work and a risk to our licence to operate.

4.3.1 WATER (EFFICIENCY, ACCESS, & QUALITY)

Water is a vital global resource and crucial to our processing activities. We seek to manage water responsibly by protecting water quality and improving our water use efficiency. Our goal is to minimize any potential water-related impacts from our operations and to ensure our activities do not compromise any shared use of water with our local communities. Our Australian operations are located in water-scarce regions and are pro-actively managing their consumption of surface and groundwater to reduce Kirkland Lake Gold’s overall water footprint.
We continue to expand and evolve our water quality monitoring and management activities – including conducting appropriate risk assessments and implementing any necessary corrective actions. Each of our operations has unique monitoring and treatment demands, based on their location, the season and the on-site process they use. Water is reclaimed as much as possible for secondary uses on site.

At our Detour Lake Mine, we proudly re-use 97% of process plant water and at Macassa Mine we re-use 90% of process plant water, helping to protect the aquatic environment. In 2019, while Macassa increased the amount of fresh water withdrawn by 33%, all fresh water that Macassa withdrew was treated and returned to the same catchment area, effectively consuming no fresh water in 2019.

Fosterville is located in a High Baseline Water Stress region as classified by the World Resources Institute’s (WRI) Water Risk Atlas tool, Aqueduct. As such, water consumption is a priority issue for our Australian Operations. In 2019, Fosterville accounted for only 4% of total fresh water withdrawn by Kirkland Lake Gold, while accounting for 35% of the company’s total gold production (tonnes).

Investments in water treatment were a priority in 2019. At the Fosterville Mine, the Company commissioned a reverse osmosis water treatment plant. We also began a pilot plant test using Moving Bed Biofilm Reactor technology at Macassa Mine. Its purpose is to demonstrate the removal efficiency of both cyanide and nitrogen compounds (ammonia specifically) from the mine’s effluent water and to reduce effluent aquatic toxicity. The pilot tests are showing significant promise as a method to manage cyanide and nitrates. As a result, the Company conducted a trade-off feasibility study for the design and construction of a full-scale plant for the operation.
Water Management at Kirkland Lake Gold:

**Quality**

- Conduct Environmental Effects Studies from our operations to monitor the impacts of our discharge to preserve biodiversity.

All our effluent water quality is above compliance standards.
- Approximately 500ML of our pit water has been used for local mango farming in Northern Territory.
- Our water discharged at Macassa is a quality that can be discharged into a stream right in town.
- Zero process water discharge into the environment at our Detour and Fosterville sites.

**Quantity**

- Avoidance of overprinting of waterbodies to the extent possible to preserve aquatic life; if impacted, fish habitat is recreated elsewhere.

- Water conservation programs to minimize groundwater and potable sources.

- Since 2018, the acidic water inventory from 7.7GL to 3.3 GL today. This 4.4 GL of acidic water has been treated and released to the environment safely.
4.3.2 COMBATING CLIMATE CHANGE

Kirkland Lake Gold recognizes that climate change is both an international and local community concern. We support the objectives of global climate accords and are actively working to enhance the ability of our operations to be resilient to the effects of climate change. We have initiated numerous processes to reduce our overall carbon footprint, such as the use of battery powered equipment.

Detour Lake Mine commissioned a climate change vulnerability assessment in 2018 that outlined risks to the operation due to a changing climate. This assessment helped inform the executive team of potential material risks to our operations directly related to the changing climate.

4.3.2.1 Case Study – Electric Vehicle Trial

Electric Vehicles (EV) provide an opportunity to reduce emissions, improve the health of our workforce, decrease energy consumption and reduce spending. While Macassa has used EVs for many years, our other operations still rely on diesel powered equipment. In 2019, we launched a trial at Fosterville for a prototype electric light vehicle for use underground, investigating its impact on drivability, safety, charging and cycle times. The data gathered through this investigation enabled us
to develop a model of energy consumption and charging requirements. This model allows us to consider various applications of the EV in our operations against the use of diesel-powered light vehicles. This trial has provided insight into the impact on daily operations and the way forward for large scale implementation.

The use of EV’s reduce emissions of CO$_2$, heat and diesel particulates underground, reducing the associated health risks within the underground working environment. They reduce the need for maintenance and refueling. EV’s provide additional benefits of significant reduction of heat output from each vehicle, which allow us to reduce ventilation requirements, further decreasing energy consumption and spending.

<table>
<thead>
<tr>
<th>Greenhouse Gas Emissions</th>
<th>2019</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Canada</td>
<td>272,564.80</td>
<td>235,016.85</td>
</tr>
<tr>
<td>Macassa</td>
<td>19,237.80</td>
<td>10,261.00</td>
</tr>
<tr>
<td>Detour</td>
<td>253,327.00</td>
<td>224,755.85</td>
</tr>
<tr>
<td>Australia</td>
<td>22,817.49</td>
<td>21,516.00</td>
</tr>
<tr>
<td>Fosterville</td>
<td>22,817.49</td>
<td>21,516.00</td>
</tr>
<tr>
<td><strong>Gross Scope 1 Emissions</strong></td>
<td><strong>295,382.29</strong></td>
<td><strong>256,532.85</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Indirect, Scope 2 Emissions (tCO2-e)</th>
<th>2019</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Canada</td>
<td>31,443.06</td>
<td>16,861.94</td>
</tr>
<tr>
<td>Macassa</td>
<td>2,804.06</td>
<td>2,542.44</td>
</tr>
<tr>
<td>Detour</td>
<td>28,639.00</td>
<td>14,319.50</td>
</tr>
<tr>
<td>Australia</td>
<td>129,257.64</td>
<td>108,372.00</td>
</tr>
<tr>
<td>Fosterville</td>
<td>129,257.64</td>
<td>108,372.00</td>
</tr>
<tr>
<td><strong>Gross Scope 2 Emissions</strong></td>
<td><strong>160,700.70</strong></td>
<td><strong>125,233.94</strong></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Total GHG Emissions (tCO2-e)</th>
<th>2019</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>KL GOLD</strong></td>
<td><strong>456,082.99</strong></td>
<td><strong>381,766.79</strong></td>
</tr>
</tbody>
</table>

**4.3.3 ENERGY (EFFICIENCY & REPORTING)**

While our mining and processing operations are energy intensive, we are actively working to reduce our environmental and carbon footprint. We focus on minimizing the adverse impact of emissions from our mining operations and processing facilities, and on improving our overall energy efficiency. We recognize this is important for global and local communities, but also essential to the success of our business.

Kirkland Lake Gold has taken steps to improve its greenhouse gas reporting and disclosure. The Macassa Mine continues to be a leader as one of the lowest greenhouse gas intensive gold mines in the world, and as part of Kirkland Lake Gold’s continuous improvement process we are
looking for ways to reduce the greenhouse gas intensity at other sites. Initiatives have been implemented to improve fuel and energy tracking with the goal that better information will lead to better energy and fuel management. In Canada, we submit an accounting of our GHG emissions to the Canadian Federal Greenhouse Gas Reporting program. As well, the Detour site participates in the federal output-based pricing system for carbon emissions and Macassa has applied to participate. Our Australian operations report energy consumption and GHG emissions to the National Pollutant Inventory (NPI) and the National Greenhouse and Energy Reporting scheme (NGERs).

Energy consumption and GHG emission intensity is closely monitored at Kirkland Lake Gold. This monitoring is part of our strategy to reduce consumption and emissions, and to increase efficiency. We currently consume a mix of energy sources from electricity, fuels and biofuels. In 2019, 13% of Kirkland Lake Gold’s overall energy was renewable.

Kirkland Lake Gold decreased the intensity of our Direct (Scope 1) GHG emissions by 4.4% in 2019. This can be attributed to Fosterville, which decreased intensity by 39%, while increasing their production (oz) by 74%. This is an increase of 6% to their direct GHG emissions, while Fosterville’s energy intensity increased only slightly from 2018 to 2019 by 4.3%.

Macassa Mine continues to be a leader as one of the lowest greenhouse gas intensive gold mines in the world. We did have an increase of 87% in our GHG intensity at Macassa from 2018 to 2019, and an increase in energy intensity by 398% for the same period. Both increases are attributable to the Shaft #4 construction project, the benefit of which will be realized in future periods when Shaft #4 becomes operational, improving efficiency and reducing GHG and energy intensity. Despite these increases, Macassa maintains its position as one of the lowest GHG intensive gold mines in the world. We achieve this low GHG intensity by using battery electric production equipment, charged from Ontario’s electrical grid which supplies low emission energy from sources such as wind, hydro and nuclear power.

As part of Kirkland Lake Gold’s continuous improvement process, we are looking for ways to reduce the greenhouse gas intensity at our sites. We continue to pursue our goal of migrating our underground equipment to battery electric vehicles, and we are exploring alternatives to diesel large haul trucks at our Detour Lake Mine. As well, initiatives have been implemented to improve fuel and energy tracking with the goal that better information will lead to better energy and fuel management. We have set a target for ourselves of achieving carbon neutrality by 2050.
## Greenhouse Gas Intensity

**Direct, Scope 1 emissions (tCO2-e/oz)**

<table>
<thead>
<tr>
<th>Country</th>
<th>2019</th>
<th>2018</th>
<th>% Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Canada</td>
<td>0.3247</td>
<td>0.2729</td>
<td>19%</td>
</tr>
<tr>
<td>Macassa</td>
<td>0.08</td>
<td>0.04</td>
<td>87%</td>
</tr>
<tr>
<td>Detour</td>
<td>0.42</td>
<td>0.36</td>
<td>17%</td>
</tr>
<tr>
<td>Australia</td>
<td>0.0368</td>
<td>0.0604</td>
<td>-39%</td>
</tr>
<tr>
<td>Fosterville</td>
<td>0.03684</td>
<td>0.06040</td>
<td>-39.01%</td>
</tr>
</tbody>
</table>

**Gross Scope 1 Emission Intensity**

<table>
<thead>
<tr>
<th></th>
<th>2019</th>
<th>2018</th>
<th>% Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Canada</td>
<td>0.2184</td>
<td>0.2284</td>
<td>-4.4%</td>
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</table>

## Energy Intensity (kWh/t)

<table>
<thead>
<tr>
<th>Country</th>
<th>2019</th>
<th>2018</th>
<th>% Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Canada</td>
<td>1185.28</td>
<td>986.05</td>
<td>20.2%</td>
</tr>
<tr>
<td>Macassa</td>
<td>852.23</td>
<td>171.3</td>
<td>398%</td>
</tr>
<tr>
<td>Detour</td>
<td>1,190.19</td>
<td>1000.0</td>
<td>19%</td>
</tr>
<tr>
<td>Australia</td>
<td>242.83</td>
<td>232.8</td>
<td>4.3%</td>
</tr>
<tr>
<td>Fosterville</td>
<td>242.83</td>
<td>232.8</td>
<td>4.3%</td>
</tr>
<tr>
<td>KL GOLD</td>
<td>1164.93</td>
<td>970.05</td>
<td>20.1%</td>
</tr>
</tbody>
</table>
5 Sustainability Ledger

**Governance**

### Production

<table>
<thead>
<tr>
<th>Gold (oz)</th>
<th>2019</th>
<th>2018</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>Canada</td>
<td>842,863.00</td>
<td>861,254.00</td>
<td>765,700.00</td>
</tr>
<tr>
<td>Macassa</td>
<td>241,297.00</td>
<td>240,126.00</td>
<td>194,237.00</td>
</tr>
<tr>
<td>Detour</td>
<td>601,566.00</td>
<td>621,128.00</td>
<td>571,463</td>
</tr>
<tr>
<td><strong>Australia</strong></td>
<td>619,366.00</td>
<td>356,230.00</td>
<td>263,845.00</td>
</tr>
<tr>
<td>Fosterville</td>
<td>619,366.00</td>
<td>356,230.00</td>
<td>263,845.00</td>
</tr>
<tr>
<td><strong>KL GOLD</strong></td>
<td>1,462,229.00</td>
<td>1,217,484.00</td>
<td>1,029,545.00</td>
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</tbody>
</table>

### Workforce

<table>
<thead>
<tr>
<th>Number of Employees</th>
<th>2019</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Canada</td>
<td>2,523</td>
<td>2,375</td>
</tr>
<tr>
<td>Macassa</td>
<td>895</td>
<td>797</td>
</tr>
<tr>
<td>Detour</td>
<td>1,064</td>
<td>988</td>
</tr>
<tr>
<td>Holt Complex</td>
<td>533</td>
<td>547</td>
</tr>
<tr>
<td>Corporate</td>
<td>51</td>
<td>43</td>
</tr>
<tr>
<td><strong>Australia</strong></td>
<td>949</td>
<td>790</td>
</tr>
<tr>
<td>Fosterville</td>
<td>651</td>
<td>550</td>
</tr>
<tr>
<td>Northern</td>
<td>298</td>
<td>240</td>
</tr>
<tr>
<td>Territory</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>KL GOLD</strong></td>
<td>3,492</td>
<td>3,165</td>
</tr>
</tbody>
</table>
## ENVIRONMENT

### Greenhouse Gas Emissions

**SASB EM-MM-110a.1**

<table>
<thead>
<tr>
<th></th>
<th>2019</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Direct, Scope 1 emissions (tCO2-e)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Canada</td>
<td>273,687.80</td>
<td>235,016.85</td>
</tr>
<tr>
<td>Macasssa</td>
<td>19,237.80</td>
<td>10,261.00</td>
</tr>
<tr>
<td>Detour</td>
<td>254,450.00</td>
<td>224,755.85</td>
</tr>
<tr>
<td>Australia</td>
<td>22,817.49</td>
<td>21,516.00</td>
</tr>
<tr>
<td>Fosterville</td>
<td>22,817.49</td>
<td>21,516.00</td>
</tr>
<tr>
<td><strong>Gross Scope 1 Emissions</strong></td>
<td>319,322.78</td>
<td>278,048.85</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Indirect, Scope 2 Emissions (tCO2-e)</strong></th>
<th>2019</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Canada</td>
<td>17,123.56</td>
<td>17,478.44</td>
</tr>
<tr>
<td>Macasssa</td>
<td>2,804.06</td>
<td>2,542.44</td>
</tr>
<tr>
<td>Detour</td>
<td>14,319.50</td>
<td>14,936.00</td>
</tr>
<tr>
<td>Australia</td>
<td>129,257.64</td>
<td>108,372.00</td>
</tr>
<tr>
<td>Fosterville</td>
<td>129,257.64</td>
<td>108,372.00</td>
</tr>
<tr>
<td><strong>Gross Scope 2 Emissions</strong></td>
<td>275,638.84</td>
<td>234,222.44</td>
</tr>
</tbody>
</table>

| **Total GHG Emissions (tCO2-e)** | KL GOLD | 594,961.62 | 512,271.29 |

### Air Quality

**SASB EM-MM-120a.1**

<table>
<thead>
<tr>
<th></th>
<th>2019</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Carbon Dioxide (C02)</strong></td>
<td></td>
</tr>
<tr>
<td>Canada</td>
<td>424,607.00</td>
</tr>
<tr>
<td>Macasssa</td>
<td>171,280.00</td>
</tr>
<tr>
<td>Detour</td>
<td>253,327.00</td>
</tr>
<tr>
<td>Australia</td>
<td>152,017.67</td>
</tr>
<tr>
<td>Fosterville</td>
<td>152,017.67</td>
</tr>
<tr>
<td><strong>KL GOLD</strong></td>
<td>728,642.34</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Particulate Matter (PM10)</strong></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Canada</td>
<td>108.01</td>
</tr>
<tr>
<td>Macasssa</td>
<td>94.109</td>
</tr>
<tr>
<td>Detour</td>
<td>13.9</td>
</tr>
<tr>
<td>Australia</td>
<td>43,816.00</td>
</tr>
<tr>
<td>Fosterville</td>
<td>43,816.00</td>
</tr>
<tr>
<td><strong>KL GOLD</strong></td>
<td>43,924.01</td>
</tr>
<tr>
<td></td>
<td>Country</td>
</tr>
<tr>
<td>------------------</td>
<td>--------------------------</td>
</tr>
<tr>
<td></td>
<td>Canada</td>
</tr>
<tr>
<td>Macassa</td>
<td>10.82</td>
</tr>
<tr>
<td>Detour</td>
<td>0.03</td>
</tr>
<tr>
<td>Australia</td>
<td>-</td>
</tr>
<tr>
<td>Fosterville</td>
<td>-</td>
</tr>
<tr>
<td>KL GOLD</td>
<td>10.85</td>
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</tbody>
</table>
### Energy Management

#### Energy Consumption

<table>
<thead>
<tr>
<th>Energy Type</th>
<th>2019</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>External Electricity</strong></td>
<td>Canada 992,163,421</td>
<td>Canada 873,934,055</td>
</tr>
<tr>
<td>kWh</td>
<td>Macassa 276,188,421</td>
<td>Detour 715,975,000</td>
</tr>
<tr>
<td></td>
<td>Australia 119,683,000</td>
<td>Australia 106,375,000</td>
</tr>
<tr>
<td></td>
<td>Fosterville 119,683,000</td>
<td>Fosterville 106,375,000</td>
</tr>
<tr>
<td></td>
<td>KL GOLD (kWh) 1,111,846,421</td>
<td>KL GOLD (kWh) 980,309,055</td>
</tr>
<tr>
<td><strong>External Electricity</strong></td>
<td>Canada 3,571,788.32</td>
<td>Canada 3,146,162.6</td>
</tr>
<tr>
<td>(Gj)</td>
<td>Australia 430,858.80</td>
<td>Australia 382,950</td>
</tr>
<tr>
<td></td>
<td>KL GOLD (Gj) 4,002,647.12</td>
<td>KL GOLD (Gj) 3,529,112.6</td>
</tr>
<tr>
<td><strong>Fuel Consumption</strong></td>
<td>Canada 3,926,936.34</td>
<td>Canada 3,529,112.6</td>
</tr>
<tr>
<td>(Gj)</td>
<td>Macassa 317,058.44</td>
<td>Macassa 317,058.44</td>
</tr>
<tr>
<td></td>
<td>Detour 3,609,877.90</td>
<td>Detour 3,609,877.90</td>
</tr>
<tr>
<td></td>
<td>Australia 309,635.79</td>
<td>Australia 309,635.79</td>
</tr>
<tr>
<td></td>
<td>Fosterville 309,635.79</td>
<td>Fosterville 309,635.79</td>
</tr>
<tr>
<td></td>
<td>KL GOLD (Gj) 4,236,572.13</td>
<td>KL GOLD (Gj) 4,236,572.13</td>
</tr>
<tr>
<td><strong>Biofuel (L)</strong></td>
<td>Canada 2,547,593.00</td>
<td>Canada 2,547,593.00</td>
</tr>
<tr>
<td></td>
<td>Macassa 2,547,593.00</td>
<td>Macassa 2,547,593.00</td>
</tr>
<tr>
<td></td>
<td>Detour 0</td>
<td>Detour 0</td>
</tr>
<tr>
<td></td>
<td>Australia 0</td>
<td>Australia 0</td>
</tr>
<tr>
<td></td>
<td>Fosterville 0</td>
<td>Fosterville 0</td>
</tr>
<tr>
<td></td>
<td>KL GOLD (L) 2,547,593.00</td>
<td>KL GOLD (L) 2,547,593.00</td>
</tr>
<tr>
<td><strong>Biofuel (Gj)</strong></td>
<td>Canada 94,928.38</td>
<td>Canada 94,928.38</td>
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<tr>
<td></td>
<td>Australia 0</td>
<td>Australia 0</td>
</tr>
<tr>
<td></td>
<td>KL GOLD (Gj) 94,928.38</td>
<td>KL GOLD (Gj) 94,928.38</td>
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<tr>
<td><strong>Total Energy Consumption</strong></td>
<td>Canada 7,629,702.73</td>
<td>Canada 7,629,702.73</td>
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<tr>
<td>(Gj)</td>
<td>Australia 740,585.38</td>
<td>Australia 740,585.38</td>
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<tr>
<td></td>
<td>KL GOLD (Gj) 10,822,952.73</td>
<td>KL GOLD (Gj) 10,822,952.73</td>
</tr>
<tr>
<td><strong>Grid Electricity (%)</strong></td>
<td>Canada 100%</td>
<td>Canada 100%</td>
</tr>
<tr>
<td></td>
<td>Australia 100%</td>
<td>Australia 100%</td>
</tr>
<tr>
<td></td>
<td>KL GOLD (%) 100%</td>
<td>KL GOLD (%) 100%</td>
</tr>
</tbody>
</table>
### Energy Intensity (kWh/t)

<table>
<thead>
<tr>
<th></th>
<th>2019</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Canada</td>
<td>1185.28</td>
<td>986.05</td>
</tr>
<tr>
<td>Macassa</td>
<td>852.23</td>
<td>171.3</td>
</tr>
<tr>
<td>Detour</td>
<td>1,190.19</td>
<td>1000.0</td>
</tr>
<tr>
<td>Australia</td>
<td>242.83</td>
<td>232.8</td>
</tr>
<tr>
<td>Fosterville</td>
<td>242.83</td>
<td>232.8</td>
</tr>
<tr>
<td>KL GOLD</td>
<td>1164.93</td>
<td>970.05</td>
</tr>
</tbody>
</table>

### Water Management

<table>
<thead>
<tr>
<th>SASB EM-MM-140a.1</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Fresh Water Withdrawn (1000m³)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Canada</td>
<td>833.32</td>
<td>760.33</td>
</tr>
<tr>
<td>Macassa</td>
<td>305.29</td>
<td>229.85</td>
</tr>
<tr>
<td>Detour</td>
<td>528.03</td>
<td>530.48</td>
</tr>
<tr>
<td>Australia</td>
<td>33.22</td>
<td>13.74</td>
</tr>
<tr>
<td>Fosterville</td>
<td>33.22</td>
<td>13.74</td>
</tr>
<tr>
<td>KL GOLD</td>
<td>866.54</td>
<td>774.07</td>
</tr>
</tbody>
</table>

**Water withdrawn in Regions of High Risk**

**Baseline water stress (%)**

- 4%
- 2%

### Total Fresh Water Consumed (1000m³)

<table>
<thead>
<tr>
<th></th>
<th>Canada</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>95.45</td>
<td></td>
</tr>
<tr>
<td>Macassa</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Detour</td>
<td>95.45</td>
<td></td>
</tr>
<tr>
<td>Australia</td>
<td>33.22</td>
<td>13.74</td>
</tr>
<tr>
<td>Fosterville</td>
<td>33.22</td>
<td>13.74</td>
</tr>
<tr>
<td>KL GOLD</td>
<td>128.67</td>
<td></td>
</tr>
</tbody>
</table>

**Water consumed in Regions of High Risk**

**Baseline water stress (%)**

- 26%

### SASB EM-MM-140a.2

**Number of incidents of non-compliance associated with water quality permits, standards, and regulations resulting in enforcement action by regulators**

<table>
<thead>
<tr>
<th></th>
<th>Canada</th>
<th>Macassa</th>
<th>Detour</th>
<th>Australia</th>
<th>Fosterville</th>
<th>KL GOLD</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

---

64
## Waste & Hazardous Materials Management

**SASB EM-MM-150a.1**

<table>
<thead>
<tr>
<th>Tailings Waste</th>
<th>Total Weight (t)</th>
<th>Canada</th>
<th>34,327,485.41</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tailings to Basin</td>
<td>Macassa</td>
<td>361,231.06</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Detour</td>
<td>33,966,254.35</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Australia</td>
<td>507,976.00</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Fosterville**</td>
<td>507,976.00</td>
<td></td>
</tr>
<tr>
<td></td>
<td>KL GOLD</td>
<td>34,835,461.41</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Amount Recycled (t)</th>
<th>Tailings to Paste</th>
<th>Canada</th>
<th>59,612.54</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Macassa</td>
<td>59,612.54</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Detour</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Australia</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Fosterville**</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td></td>
<td>KL GOLD</td>
<td>59,612.54</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Recycled (%)</th>
<th></th>
<th>Canada</th>
<th>0.171%</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Australia</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td></td>
<td>KL GOLD</td>
<td>0.17%</td>
<td></td>
</tr>
</tbody>
</table>

**SASB EM-MM-150a.2**

<table>
<thead>
<tr>
<th>Mineral Processing Waste</th>
<th>Total Weight (t)</th>
<th>Canada</th>
<th>1,087.84</th>
</tr>
</thead>
<tbody>
<tr>
<td>Macassa*</td>
<td>38.01</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Detour*</td>
<td>1,049.83</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Australia</td>
<td>59.00</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fosterville**</td>
<td>59.00</td>
<td></td>
<td></td>
</tr>
<tr>
<td>KL GOLD</td>
<td>1,146.84</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* A density of 885 kg/m³ was assumed when calculating the conversion from litres to metric tons.

**Fosterville’s Tailings data is calculated based on the fiscal year**

**SASB EM-MM-150a.3**

<table>
<thead>
<tr>
<th>Number of tailings impoundments</th>
<th>Canada</th>
<th>4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Macassa</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>Detour</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>Australia</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>Fosterville</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>KL GOLD</td>
<td>8</td>
<td></td>
</tr>
</tbody>
</table>
### Biodiversity

**SASB EM-MM-160a.2**

<table>
<thead>
<tr>
<th>Acid Rock Drainage</th>
<th>2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>Predicted to occur (%)</td>
<td>KL GOLD</td>
</tr>
<tr>
<td>Actively mitigated (%)</td>
<td>KL GOLD</td>
</tr>
<tr>
<td>Under treatment or remediation (%)</td>
<td>KL GOLD</td>
</tr>
</tbody>
</table>

**SASB EM-MM-160a.3**

<table>
<thead>
<tr>
<th>Reserves in or near sites with protected conservation status or endangered species habitat (%)</th>
<th>2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>Macassa</td>
<td>0%</td>
</tr>
<tr>
<td>Detour</td>
<td>100%</td>
</tr>
<tr>
<td>Fosterville</td>
<td>100%</td>
</tr>
<tr>
<td>KL GOLD</td>
<td>77%</td>
</tr>
</tbody>
</table>
### SOCIAL

#### Security & Human Rights

<table>
<thead>
<tr>
<th>SASB EM-MM-210a.1</th>
<th>2019</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reserves in or near conflict (%)</td>
<td>Proven</td>
<td>0%</td>
</tr>
<tr>
<td></td>
<td>Probable</td>
<td>0%</td>
</tr>
</tbody>
</table>

#### Rights of Indigenous Peoples

<table>
<thead>
<tr>
<th>SASB EM-MM-210a.2</th>
<th>2019</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reserves on or near Indigenous Land (%)</td>
<td>Proven</td>
<td>100%</td>
</tr>
<tr>
<td></td>
<td>Probable</td>
<td>100%</td>
</tr>
</tbody>
</table>

#### Community Relations

<table>
<thead>
<tr>
<th>SASB EM-MM-210b.2</th>
<th>2019</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-Technical Delays</td>
<td>Number</td>
<td>KL GOLD</td>
</tr>
<tr>
<td></td>
<td>Duration</td>
<td>KL GOLD</td>
</tr>
</tbody>
</table>

#### Labour Relation

<table>
<thead>
<tr>
<th>SASB EM-MM-310a.1</th>
<th>2019</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Workforce Covered under collective bargaining agreements</td>
<td>KL GOLD</td>
<td>9%</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SASB EM-MM-310a.2</th>
<th>2019</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strikes &amp; Lockouts</td>
<td>Number</td>
<td>KL GOLD</td>
</tr>
<tr>
<td></td>
<td>Duration</td>
<td>KL GOLD</td>
</tr>
</tbody>
</table>

#### Workforce Health & Safety

<table>
<thead>
<tr>
<th>SASB EM-MM-320a.1</th>
<th>2019</th>
<th>2018</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fatality Rate</td>
<td>KL GOLD</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Total Medical Injury Frequency Rate (TMIFR)</th>
<th>Canada</th>
<th>2019</th>
<th>2018</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>Macassa</td>
<td>3.2</td>
<td>4</td>
<td>5.4</td>
<td></td>
</tr>
<tr>
<td>Detour</td>
<td>1.44</td>
<td>2.05</td>
<td>1.08</td>
<td></td>
</tr>
<tr>
<td>Australia</td>
<td>4.58</td>
<td>6.8</td>
<td>4.2</td>
<td></td>
</tr>
<tr>
<td>Fosterville</td>
<td>4.58</td>
<td>6.8</td>
<td>4.2</td>
<td></td>
</tr>
<tr>
<td>KL GOLD</td>
<td>3.45</td>
<td>4.9125</td>
<td>3.72</td>
<td></td>
</tr>
</tbody>
</table>
### Health, Safety, and Emergency Response Training

<table>
<thead>
<tr>
<th>Full-Time Employees (Average Hours)</th>
<th>2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>Canada</td>
<td>20.8</td>
</tr>
<tr>
<td>Macassa</td>
<td>1.8</td>
</tr>
<tr>
<td>Detour</td>
<td>35.3</td>
</tr>
<tr>
<td>Australia</td>
<td>3.9</td>
</tr>
<tr>
<td>Fosterville</td>
<td>3.9</td>
</tr>
<tr>
<td>KL GOLD</td>
<td>16.4</td>
</tr>
</tbody>
</table>

### Business Ethics & Transparency

<table>
<thead>
<tr>
<th>Production in Countries that have the 20 lowest rankings in Transparency</th>
<th>2019</th>
<th>2018</th>
<th>2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>KL GOLD</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>
The Responsible Gold Mining Declaration

We believe that responsibly undertaken, gold mining plays an important role in supporting sustainable development. The Responsible Gold Mining Principles provide a guide for stakeholders to what we believe are the key elements of responsible gold mining across the mine life-cycle.

Responsible gold mining is conducted with respect for the environment and the human rights and wellbeing of our employees, contractors and members of the communities associated with our activities. When coupled with good governance, responsible gold mining delivers benefits for host countries and local communities. It contributes to socio-economic development through increasing prosperity, providing jobs and supply chain opportunities, and raising technical standards through innovation and building skills. Through partnerships with governments and other actors, it enables investment in infrastructure and improvements in public services.

Our stakeholders – including governments, investors, employees and contractors, communities, supply chain partners and civil society – expect that the development of gold resources will be conducted responsibly and that gold mining companies will act in ways that are ethical, transparent, accountable and respectful of the rights of others. We recognize the importance of increasing the diversity of our workforce, including the representation of women and other historically under-represented groups, so that it better reflects the make-up of the societies of which we are a part.

We seek to gain and retain the support of authorities and affected communities throughout the exploration, development, production and closure phases of the mine life-cycle. In order to deliver sustainable development, we will seek, through dialogue, to work in partnership with others, to leave a positive legacy for host countries, local people and future generations.

In many locations, formal gold mining operations interface with artisanal and small-scale (ASM) gold miners. We recognize that ASM represents an important source of livelihoods. Where ASM is conducted responsibly and with respect for formal mining titles, we will seek to support ASM groups in the adoption of safer working methods and more socially and environmentally responsible practices and, where relevant, will consider the potential for alternative livelihood programs.

Gold plays a unique role in the global economy and in protecting the financial security of nations, communities and families, and in enabling advances in medical, environmental and communication technologies. Public trust is fundamental to the many positive roles that gold plays in society. To maintain and strengthen that trust, as leading gold mining companies we commit to the following Principles:

### Governance

1. **Ethical conduct:** we will conduct our business with integrity including absolute opposition to corruption.

2. **Understanding our impacts:** we will engage with our stakeholders and implement management systems so as to ensure that we understand and manage our impacts, realize opportunities and provide redress where needed.

3. **Supply chain:** we will require that our suppliers conduct their businesses ethically and responsibly as a condition of doing business with us.

### Social

4. **Safety and health:** we will protect and promote the safety and occupational health of our workforce (employees and contractors) above all other priorities, and will empower them to speak up if they encounter unsafe working conditions.

5. **Human rights and conflict:** we will respect the human rights of our workforce, affected communities and all those people with whom we interact.

6. **Labour rights:** we will ensure that our operations are places where employees and contractors are treated with respect and are free from discrimination or abusive labour practices.

7. **Working with communities:** we aim to contribute to the socio-economic advancement of communities associated with our operations and to treat them with dignity and respect.

### Environment

8. **Environmental stewardship:** we will ensure that environmental responsibility is at the core of how we work.

9. **Biodiversity, land use and mine closure:** we will work to ensure that fragile ecosystems, critical habitats and endangered species are protected from damage and we will plan for responsible mine closure.

10. **Water, energy and climate change:** we will improve the efficiency of our use of water and energy, recognizing that the impacts of climate change and water constraints may increasingly become a threat to the locations where we work and a risk to our license to operate.
## Reserves

<table>
<thead>
<tr>
<th>Proven and Probable</th>
<th>December 31, 2019</th>
<th>December 31, 2018</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Tonnes (000’s)</td>
<td>Grade (g/t)</td>
</tr>
<tr>
<td>Macassa</td>
<td>3,320</td>
<td>22.1</td>
</tr>
<tr>
<td>Macassa Near Surface</td>
<td>273</td>
<td>10.7</td>
</tr>
<tr>
<td>Detour Lake Pit</td>
<td>397,680</td>
<td>0.99</td>
</tr>
<tr>
<td>West Detour Pit</td>
<td>54,920</td>
<td>0.94</td>
</tr>
<tr>
<td>North Pit</td>
<td>5,950</td>
<td>0.98</td>
</tr>
<tr>
<td>Detour Low Grade Fines</td>
<td>18,900</td>
<td>0.59</td>
</tr>
<tr>
<td>Fosterville</td>
<td>3,000</td>
<td>21.8</td>
</tr>
<tr>
<td>Robbins Hill</td>
<td>1,240</td>
<td>5.5</td>
</tr>
</tbody>
</table>

### Detailed footnotes related to Mineral Reserve Estimates (dated December 31, 2019) - with the exception of Detour:

1. CIM definitions (2019) were followed in the estimation of Mineral Reserves.
2. Mineral Reserves were estimated using a long-term gold price of US$1,300/oz (C$1,700/oz; A$1,765/oz).
3. Cut-off grades for Canadian Assets were calculated for each stope and included the costs of: mining, milling, General and Administration, royalties and capital expenditures and other modifying factors (e.g. dilution, mining extraction, mill recovery).
4. Cut-off grades for Australian Assets were calculated for each mining block and included the costs of: mining, milling, General and Administration, royalties and capital expenditures and other modifying factors (e.g. dilution, mining extraction, mill recovery).
5. Dilution estimates vary by mining methods and ranges from 5% to 50%.
6. Extraction estimates vary by mining methods and range from 50% to 100%.
7. Mineral Reserves estimates for Canadian Operations were prepared under the supervision of N.Vaz, P. Eng.
8. Mineral Reserves estimates for Australian Operations were prepared under the supervision of I. Holland, FAusIMM
9. Mineral Reserves are stated at a mill feed reference point.
10. Totals may not add up due to rounding.

**Detailed footnotes related to Detour's Mineral Reserve and Resource Estimates (dated December 31, 2019):**

1. The Company’s mineral reserve and mineral resource statement is classified in accordance with the Canadian Institute of Mining, Metallurgy and Petroleum (“CIM”) “CIM Definition Standards - For Mineral Resources and Mineral Reserves” adopted by the CIM Council (as amended, the “CIM Definition Standards”) in accordance with the requirements of National Instrument 43-101 “Standards of Disclosure for Mineral Projects” (“NI 43-101”). Mineral reserve and mineral resource estimates reflect the Company's reasonable expectation that all necessary permits and approvals will be obtained and maintained.
2. Mineral reserves were estimated using a gold price of US$1,000/oz and mineral resources were estimated using a gold price of US$1,200/oz at a $US/CDN exchange rate of 1.10.
3. Mineral reserves and resources were based on a cut-off grade of 0.50 g/t Au.
4. LG fines (sourced from material grading 0.40 - 0.50 g/t Au) classified as Measured or Indicated were reported as Probable mineral reserves and included in the mine plan. Reported tonnage is defined as material scheduled to be fed from 2021 to the end of the mine as per 2018 life of mine plan.
5. Further information, including key assumptions, parameters, and methods used to estimate mineral resources and mineral reserves are described in the Technical Report on the Detour Lake operation, dated Nov 26th, 2018.
6. Mineral underground resources for 58N reported at a cut-off grade of 2.2 g/t Au, using a gold price of US$1,300 per ounce and a $US/$CDN exchange rate of 1.25 with an assumed mining dilution of 12%.
7. Mineral resources are reported exclusive of mineral reserves. Mineral resources that are not mineral reserves do not have demonstrated economic viability. Mineral resources are constrained within an economic pit shell.
8. Mineral Reserves and Mineral Resource estimates for the Detour Operation was prepared under the supervision of A. Leite, P.Eng, AUSIMM CP (MIN), MEng, P. Eng.
9. Totals may not add due to rounding.
APPENDIX 3

Code of Conduct and Ethics
CODE OF CONDUCT AND ETHICS

Updated: December 2019
MESSAGE FROM THE PRESIDENT & CHIEF EXECUTIVE OFFICER

Dear colleagues,

Honesty and integrity foster a positive work environment that strengthens the confidence of all our stakeholders. At Kirkland Lake Gold, our reputation as a responsible resource company and good corporate citizen must be maintained if our company is to grow and prosper.

Kirkland Lake Gold’s Code of Conduct and Ethics is your guide on how we uphold our values and maintain the highest standards of ethical integrity. The Code applies to the board of directors, officers, employees and contractors of Kirkland Lake Gold, setting a clear standard of expectation in all of your work-related activities. Because not every situation is covered in the Code, it is important that we follow the spirit of the document, not just the words. When in doubt, ask your manager or one of the contacts listed on the back page for guidance.

If you know of, or suspect, any violations of this Code, you are expected to bring your concerns to your manager or HR representative. If you prefer, you can report concerns anonymously through ConfidenceLine, the Company’s confidential whistleblower hotline, at the toll-free number listed in the Code. The Company will investigate the matter and protect you from any form of retaliation when you report a concern honestly and in good faith.

Thank you for your continued dedication to Kirkland Lake Gold and for your ongoing efforts to preserve our reputation as a responsible corporate citizen.

(signed) “Anthony Makuch”
Anthony Makuch
President & Chief Executive Officer
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Fraud Prevention
Protection and Proper Use of Company Property
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Safety as Top Priority
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OUR RESPONSIBILITIES

INTRODUCTION

This Code is intended to guide employees on how to properly conduct themselves and act ethically in connection with our work.

It should not be assumed that questionable activities are allowable just because they are not mentioned specifically in this Code. If the Code does not deal with a situation you are faced with, ask yourself the following questions before you act.

- Is it legal?
- Is it fair?
- Would it embarrass me or the Company if I read about it in the newspaper?
- Does it just feel wrong?

Ask your manager for advice if you are still in doubt about a questionable activity after asking yourself the questions above.

COMMITMENT

To demonstrate our determination and commitment, the Company asks each director, officer and employee to review the Code periodically. Take the opportunity to discuss with management any circumstances that may have arisen that could be an actual or potential violation of these ethical standards of conduct.

RESPONSIBILITY FOR THE CODE

The Corporate Secretary of the Company maintains the Code and, with executive management, is responsible for putting it into practice throughout the Company and monitoring its effectiveness.

The Board of Directors of the Company must approve any changes to the Code before they can be made and put into practice. You will be informed of any changes made to the Code.

You contribute to the ethical culture of Kirkland Lake Gold when you report violations of the Code. You are protected from any form of retaliation when you report your concerns honestly. If you know of, or suspect, any violations of the Code, you should speak to your manager. You may also report any violation or ask any questions about the Code by contacting the Corporate Secretary or the Human Resource Department. Concerns about violations of the Code can also be reported through ConfidenceLine, the Company’s confidential whistleblower hotline.
CONFIDENCELINE
WHISTLEBLOWER HOTLINE

The Company has a 24/7, 365 day a year confidential whistleblower hotline operated by an external service provider. You can report any violations of the Code through ConfidenceLine at any time.

- Anonymous
- Easy to Use
- Immediate
- Bilingual Services (English and French)
- Phone-based

WITHIN CANADA AND THE US DIAL 1-800-661-9675, 24 hours a day, 365 days a year.
WITHIN AUSTRALIA DIAL 0011.80033881766, 24 hours a day, 365 days a year.

You will be connected to the first available Call Assistant. You may give your name, or choose to remain anonymous. You will be given a personal Caller Identification Number (CIN), the only identification you will require when making subsequent calls to ConfidenceLine.

ConfidenceLine is an interactive service that puts you in touch with independent, trained professional assistants when you need help with sensitive information or issues relating to your place of employment. This includes issues such as:

- Fraud/Theft
- Discrimination
- Ethics Violations
- Substance Abuse
- Workplace Violence
- Harassment
- Conflicts of Interest
- Violations of Regulations
- Safety/Security Violations
- Malicious Property Damage
- Falsification of Company Records
- Release of Proprietary Information

What Happens After You Make the Call?

The Call Assistant will create a report with all pertinent information about the call and forward it to the appropriate authority. Reports received by ConfidenceLine will be sent to the Chair of the Audit Committee, as well as the Corporate Secretary of the Company. Kirkland Lake Gold takes these reports very seriously and will take the appropriate action to address the situation.
COMPLIANCE WITH LAWS, RULES AND REGULATIONS

The Company must comply with all applicable laws, rules and regulations and governmental requirements. In addition, the Company strives to comply not only with requirements of the law but also with recognized compliance practices. All illegal activities or illegal conduct by or on behalf of the Company is prohibited whether or not such conduct is specifically identified in the Code. Familiarize yourself with, and follow, the laws, rules and regulations that apply to your job. Make sure you act ethically and are alert to any potentially unethical practices of others. Check with your manager if you are not sure of the laws, rules and regulations that apply to your job. Business should always be conducted in a fair and forthright manner.

FILING OF GOVERNMENT REPORTS

Any reports or information provided by the Company, or on our behalf, to federal, provincial, territorial, state, local or foreign governments must be true and accurate. You are required to assist the Company in providing true and accurate reports and information. Any omission, misstatement or lack of attention to detail could result in a violation of the reporting laws, rules and regulations.

BRIBES AND KICKBACKS

Bribes and kickbacks are common examples of unethical business practices. It’s not ethical to offer money or any type of reward to a government official, outside contractor, supplier or anyone else, directly or indirectly, in order to obtain or retain an improper advantage. If you take part in these kinds of practices or any other unethical business practices, you not only violate the Code of Conduct and Ethics, but you also damage our reputation and put yourself, the Company and its directors and officers at risk of fines, charges and possibly jail.

When dealing with government representatives or officials and private parties, no improper payments will be tolerated. If you become aware of or receive any solicitation for, or offer of, money or a gift, that is intended to influence an official decision or business decision inside or outside the Company, it should be reported immediately to the CEO or the Corporate Secretary.

Please refer to the Company’s Anti-Bribery and Anti-Corruption Policy and procedures implemented in respect of that policy for more information.

CORRUPTION OF FOREIGN PUBLIC OFFICIALS ACT

The Corruption of Foreign Public Officials Act (Canada), the Criminal Code (Canada), the Criminal Code Act 1995 (Australia) and the United States Foreign Corrupt Practices Act of 1977, as amended, contain certain prohibitions with respect to giving anything of value, directly or indirectly, to foreign government officials or certain other individuals in order to obtain, retain or direct business for or to any person. Accordingly, corporate funds, property or anything of value may not be, directly or indirectly, offered or given by you or an agent acting on our behalf to a government official or employee, employee or agent of a state-owned or controlled enterprise, employee or agent of a public international organization, political party or official or any candidate for political office, including any family member or household member of any of the above, for the purpose of influencing any act or decision of such party of person or inducing such party or person to use his or her influence or to otherwise secure any improper advantage, in order to assist in obtaining or retaining business for, or directing business to, any person.
CONFLICTS OF INTEREST

A conflict of interest occurs when relationships, actions or interests outside of work interfere, might interfere, or even appear to interfere with your duties or Kirkland Lake Gold’s business interests. Such conflicts of interest can undermine your business judgment and your responsibility to the Company, and threaten the Company's business and reputation. All apparent, potential, and actual conflicts of interest should be scrupulously avoided. Examples of potential conflicts include:

- **Employment/Outside Employment:** You are expected to devote your full attention to the business interests of the Company. You are prohibited from engaging in any business activities that interfere with your performance or responsibilities to the Company or is otherwise in conflict with or prejudicial to the Company. Our policies prohibit any employee, consultant, officer or director of the Company from accepting simultaneous engagement with a Company supplier, customer, developer or competitor, or from taking part in any activity that enhances or supports a competitor's position. Additionally, you must immediately disclose to the Company any interest that you have that may conflict with the business of the Company. If you have any questions on this requirement, you should contact either the VP Legal of the Company or the Chair of the Corporate Governance and Nominating Committee (the “CGC”).

- **Outside Directorships:** It is a conflict of interest for any employee, consultant or officer to serve as a director of any company that competes with Kirkland Lake Gold. Although you may serve as a director of another company, our policy requires that such position not conflict or otherwise interfere with your duties to the Company and that you first obtain written approval from the Company’s Chair of the Board or CEO, before accepting a directorship.

- **Business Interests:** If you are considering investing in a Company customer, supplier, developer or contractor, you must first take great care to ensure that these investments do not compromise your responsibilities to the Company. You should generally aim to avoid even the appearance of impropriety or conflict. Employees, consultants, officers and directors of the Company shall not acquire any property, security or any business interest that they know the Company is interested in acquiring. Moreover, based on such advance information, employees, consultants, officers and directors of the Company shall not acquire any property, security or business interest, which they know the Company is interested in acquiring, for speculation or for investment.

- **Transactions with Relatives:** As an absolute rule, you should avoid conducting Company business with a relative or significant other, or with a business in which a relative or significant other is associated in any significant role. Relatives include spouse, sister, brother, daughter, son, mother, father, grandparents, step relationships and in-laws. Significant others include persons living in a spousal or familial fashion with an employee, consultant, officer or director. If such transaction is unavoidable, consultants and employees (other than officers) must fully disclose the nature of the transaction to CGC or to the VP Legal in order to ensure the transaction is implemented in an ethical manner. Any unavoidable transactions involving the directors and officers of the Company require the full disclosure of such transaction to the Chair of the Board. The Company is required to report all related party transactions under applicable accounting rules and securities regulations. The Company discourages the employment of relatives and significant others in positions or assignments within the same department and prohibits the employment of such individuals in positions that have financial dependence or influence (i.e. auditing or control relationship, or a supervisor/subordinate relationship). If a prohibited relationship exists, the employee in the senior position must bring this to the attention of his/her supervisor.
If you have an actual, potential or perceived conflict, you must not take part in discussions or decision-making related to the conflict unless allowed by the applicable decision-makers. You will be in violation of the Code and are subject to discipline or even dismissal if you do not disclose any conflict of interest you may have.

**INSIDER TRADING**

Buying or selling shares or financial securities of the Company when you have knowledge of material confidential information about the Company is illegal. Insider trading is a violation of our Company rules and is against the law. Before you purchase or sell any securities (e.g. common shares or debentures) of the Company or exercise any options to acquire shares of the Company, make sure you have read, understand and follow the Company’s *Insider Trading Policy* and *Disclosure and Confidentiality Policy*.

Check with the Corporate Secretary or Chief Financial Officer if you are unsure about the rules before you trade any Kirkland Lake Gold shares or financial securities.

Special rules apply to employees and directors considered to be “reporting insiders” under securities laws and as determined by senior management. The Corporate Secretary will inform you if you are a reporting insider. If you are a reporting insider, you must pre-clear your trading activity with the Corporate Secretary before buying or selling Kirkland Lake Gold securities or exercising stock options.

In addition, the Corporate Secretary will announce blackout periods to inform reporting insiders when trading in Kirkland Lake Gold securities is prohibited by them.

Reference should be made to the Company’s *Insider Trading Policy*.

**PROTECTION OF CONFIDENTIAL INFORMATION**

As part of your work, you may learn confidential information about the Company. You must always maintain the confidentiality of this information except when you have permission from your manager to disclose it or are required to disclose it by law. Unless otherwise agreed to in writing, confidential and proprietary information includes all non-public information that might be of use to competitors, or that might be harmful to the Company or its customers, if disclosed. Confidential and proprietary information about the Company belongs to the Company and must be treated with the strictest confidence and is not to be disclosed with others.

You are prohibited from:

- Sharing any confidential information that you know about, due to working at Kirkland Lake Gold, with anyone outside the Company, verbally or in writing including through social media platforms
- Making statements to the media about the Company without the permission of executive management
- Granting, sharing or providing access to Company confidential information to any unauthorized person
- Sharing information from an employee’s personnel file. Employee files are available only to appropriate employees on a “need-to-know” basis and in compliance with applicable law
- Using any confidential information you receive due to working at Kirkland Lake Gold for your own personal benefit, the benefit of your friends or family members or anyone else other than the Company
From time to time, as a result of your employment with the Company, you may receive confidential information about other companies. If you receive or become aware of any such information, you must not disclose it to any other person without the authorization from executive management.

The following examples of information are not considered confidential:

- Information that is in the public domain to the extent it is readily available;
- Information that becomes generally known to the public other than by disclosure by the Company or a director, officer or employee; or
- Information you receive from a party which is under no legal obligation of confidentiality with the Company with respect to such information.

The Company has exclusive rights to all confidential and proprietary information regarding the Company. You are responsible for safeguarding Company information and complying with established security controls and procedures. All documents, records, notebooks, notes, memorandum and similar repositories of information containing confidential information relating to the Company or our operations and activities made or compiled by the directors, officers, or employees of the Company, including yourself, and any copies thereof, belong to the Company and shall be held by you in trust solely for the benefit of the Company and shall be delivered to the Company by you on the termination of your association with us or any other time we request.

**FRAUD PREVENTION**

Fraud happens when someone acts dishonestly to make money illegally or to get an unfair advantage. Examples include stealing, forgery, identity theft, misuse of assets, taking kickbacks and making false reports.

Kirkland Lake Gold does not tolerate fraud. You must report any suspected fraud to your manager. If this creates a conflict for you, contact the Corporate Secretary, or you can report your suspicion anonymously through ConfidenceLine. You will be protected from any form of punishment or retaliation when you honestly report suspected cases of fraud. Retaliation for reporting an offence may be illegal under applicable law and is prohibited under this Code.

**CONDUCT WITHIN KIRKLAND LAKE GOLD AND IN THE COMMUNITY**

**SAFETY AS TOP PRIORITY**

We are all accountable for safety. No job is so important that we cannot take the time to do it safely. Check the Company’s safety, health and environmental policies and procedure documents for the principles we follow on workplace health and safety.

Report any actual or potential safety or health risks you discover at work to your manager or to executive management. If you are uncomfortable speaking to someone in the Company directly or if you wish to report your concerns anonymously, you can also report your concerns through ConfidenceLine.

**WORKPLACE VIOLENCE PREVENTION**

The Company prohibits all acts of physical, verbal or written aggression or violence. This applies whether the aggression is committed by one employee against another, or against anyone else an employee comes in contact with when carrying out his or her responsibilities.

You must report any act, or threatened act, of violence to a manager or to the Company’s security personnel. In situations of imminent danger, call the police or local emergency services and then
security personnel. If the danger seems less imminent, take note of the facts and then report the incident to the Company’s security personnel:

- Who was involved?
- Where and when did the incident take place?
- Were there any witnesses?

Violence of any kind is not tolerated and will result in disciplinary measures up to and including termination.

**RESPECTFUL WORKPLACE**

You have the right to work in a place that encourages equal opportunity and prohibits discrimination. The Company does not allow any sort of harassment at Kirkland Lake Gold. Harassment is a comment or conduct that is known (or should be known) to be unwelcome or offensive to a reasonable person. There shall be no discrimination against any employee, consultant, officer, director or applicant because of race, ancestry, place of origin, political belief, religion, marital status, family status, physical or mental disability, sex, sexual orientation or age.

Reference should be made to the *Workplace Harassment and Discrimination Policy*.

**ALCOHOL, DRUGS AND OTHER SUBSTANCES**

You are required to be fit at all times to perform all of your assigned duties.

The use, sale, unlawful possession, manufacture or distribution of alcohol and illicit or recreational drugs or non-prescribed medications for which a prescription is legally required, whether on Company work premises or other work locations, is strictly prohibited and will result in disciplinary measures up to and including termination.

Reference should be made to the Company’s *Fitness for Duty Policy*.

**USE OF COMPUTER SYSTEMS, EMAIL, INTERNET AND SOCIAL MEDIA**

Our computer systems, email and internet are for business use. The information you view and share – whether for business or personal use – must be appropriate, respectful and according to our policies. Except for limited personal use of the Company’s telephones, tablets, mobile devices and computers, such equipment may only be used for business purposes. Officers and employees should not expect a right to privacy of their email, Internet or network use. All communications, e-mails or Internet use on Company equipment or networks may be subject to monitoring by the Company for legitimate business purposes.

You shall not participate in, host or link to chat rooms, blogs, social networking sites or bulletin boards in relation to Company corporate matters. Only the VP, Investor Relations, or other Authorized Spokespersons from time to time authorized with the express written permission of the VP, Investor Relations, may post on the Company’s social media pages.

Reference should be made to the Company’s *Disclosure and Confidentiality Policy*.

**SOCIAL AND COMMUNITY GIVING**

The Company strives to support several worthwhile community causes by donating our human and financial resources. Kirkland Lake Gold encourages volunteer work and charitable giving.
ENVIRONMENTAL MATTERS

The Company is continually looking for ways to improve how we protect the environment. Pollution prevention, compliance with environmental laws, keeping the environmental risks at levels as low as reasonably achievable, and ensuring quality of environmental processes are just some of our efforts.

If you have any concerns about how our operations might be affecting the environment, report them to your manager or the Corporate Secretary. You can also report your concerns anonymously through ConfidenceLine.

You are protected from any form of retaliation when you report your concern honestly.

CONDUCT WITH SHAREHOLDERS AND THE PUBLIC

CORPORATE DISCLOSURE

The Company endeavors to ensure that at all times our public disclosure is timely, complete, accurate and balanced. Avoiding any misrepresentation of our operations or finances is critical to our relationship with our investors. Proper reporting of reliable, truthful and accurate information is a complex process involving the cooperation among many of us. We must all work together to ensure that reliable, truthful and accurate information is disclosed to the public. The Company must disclose to the applicable Canadian securities regulatory authorities’ information that is required, and any additional information that may be necessary to ensure the required disclosures are not misleading or inaccurate. The Company requires you to participate in the disclosure process in accordance with the Disclosure and Confidentiality Policy which is overseen by the Disclosure Committee appointed in accordance with such policy. Participation in the disclosure process is a requirement of a public company, and full cooperation with the members of the Disclosure Committee and other officers, managers and employees in the disclosure process is a requirement of this Code.

Information about our mineral reserves and resources, operating results, financial statements and corporate activities must be treated as confidential until the Company makes the determination to disclose it.

If you are involved in preparing information that is to be publicly disclosed on behalf of the Company, you must follow our disclosure and financial reporting controls and procedures, as well as securities laws and regulations.

No one is authorized to release any public disclosure documents on behalf of the Company until such disclosure has been reviewed and approved by the Company’s Disclosure Committee in accordance with the Company’s Disclosure and Confidentiality Policy.

Only authorized spokespersons have authority to speak publicly about the Company, our activities and our securities. Unless you are specifically authorized, do not create the impression that you are speaking for the Company. This includes social media channels such as Facebook, LinkedIn, Twitter and YouTube. Refer all enquiries from shareholders, analysts and the media to one of our authorized spokespersons.

Reference should be made to the Company’s Disclosure and Confidentiality Policy for more information.
FINANCIAL REPORTING AND ADMINISTRATION

The Company strictly adheres to all applicable securities laws, regulations, accounting standards, accounting controls, audit practices and keeps proper records to meet our legal and financial obligations and to manage our business.

If you prepare a financial report for shareholders and the public, it must fairly present the information and follow international financial reporting standards as well as all applicable laws and regulations. If you have any responsibility for creating or keeping records, ensure they are accurate and complete, and that you follow the corporate procedures relevant to your job. Never falsely record information about Company assets or hide information about assets, liabilities, revenues or expenses. Inaccurate financial reports can bring stiff penalties and prosecutions under securities and criminal laws.

If you have any concerns about our accounting or auditing practices you should report them to your manager, or if this would create a conflict for you, to the Chair of the Audit Committee of the Company’s Board of Directors directly. You can also report anonymously through ConfidenceLine, the Company’s whistleblower hotline. The Audit Committee is responsible for ensuring that all such concerns are appropriately dealt with.

Anyone from outside the Company can also report a concern. If you receive a concern from someone outside the Company, report it promptly to the Chair of the Audit Committee of the Company’s Board of Directors directly, or through the ConfidenceLine, our whistleblower hotline.

HOW TO REPORT A CONCERN ABOUT AN ACCOUNTING PRACTICE

Report your concern in confidence to the Chair of the Audit Committee by sending a sealed letter by mail (or other delivery) addressed to:

Kirkland Lake Gold Ltd.
Royal Bank Plaza, South Tower
200 Bay Street, Suite 3120
Toronto, ON M5J 2N7

PRIVATE AND STRICTLY CONFIDENTIAL
ATTENTION: CHAIR OF THE AUDIT COMMITTEE

OR

Report your concern anonymously through ConfidenceLine.
FAIR DEALING

Kirkland Lake Gold’s success depends on our relationships with contractors, suppliers and competitors. These relationships can be damaged if you do not deal with people fairly, honestly and respectfully. Examples of unfair practices include manipulating or hiding information or twisting the facts.

As an employee of Kirkland Lake Gold, you may give and accept modest gifts and invitations in the spirit of business courtesy and relationship management provided such gifts or invitations are consistent with customary business practices and do not influence or appear to influence how you carry out your duties, are not cash, do not violate any applicable laws and do not violate this Code.

Examples of Acceptable Gifts and Invitations

- Pens, hats, shirts, mugs and similar items with a company’s logo
- Gifts of chocolate, cookies or similar items
- Reasonable invitations to business-related meetings or conferences
- Invitations to social, cultural or sporting events if the cost is reasonable, your host will be present and your attendance serves a customary business purpose
- Invitations to join your host at sports events, golf or similar events that are customary within the industry for people in jobs like yours and where they promote good working relationships, upon utilizing appropriate discretion, are considered reasonable in such circumstances.

Always check with the Corporate Secretary, Chief Financial Officer or the Chief Executive Officer if you are unsure about whether or not you should give or receive a gift in your capacity as an employee of Kirkland Lake Gold.

ADMINISTRATION OF THIS CODE

ANNUAL REVIEW OF THE CODE

All employees must read, review or acknowledge this Code on an annual basis. Report any actual, potential or perceived conflict you have on the acknowledgement form and sign it to show that you have read, understand and agree to follow the Code. Promptly complete and submit a new Acknowledgement form at any time an actual, potential or perceived conflict of interest arises that you haven’t already declared.

The Board of Directors of the Company will review this Code annually and make amendments as necessary. Amended versions of the Code will be made available to all employees.

THERE ARE CONSEQUENCES FOR VIOLATING THIS CODE

You could be reprimanded, demoted, suspended or even dismissed if you do not follow this Code. Not following a policy document referred to in this Code will be treated as a violation of this Code.

Report any concerns regarding a violation or potential violation of this Code to your manager, to human resources, or to the Corporate Secretary. If you prefer, you can report your concern anonymously through ConfidenceLine, which is available 24/7 and is operated by an external service provider.
You are protected from any form of retaliation or punishment when you report a concern honestly and with the right intentions. Your manager and anyone else in the Company will face serious consequences if they try to punish you in any way for reporting a concern.

If you believe you are being punished in some way for reporting a concern, you should report this to your manager, human resources, the Corporate Secretary or through ConfidenceLine, whichever is most appropriate or comfortable for you.

INVESTIGATIONS

The Company will investigate behavior that may violate the law, the Code, or that may otherwise harm Kirkland Lake Gold’s reputation. You are required to cooperate in the investigation. Interference with the investigation is prohibited and is a violation of the Code. You must not destroy records or information related to the investigation, lie or misrepresent facts, attempt to discover the identity of others cooperating in the investigation, disclose information to unauthorized individuals, or retaliate against anyone involved in the investigation.

The Company strives to maintain confidentiality to the greatest degree possible. Information provided or discovered in the course of an investigation will only be disclosed as necessary.

The Audit Committee will oversee the receipt, retention and treatment of complaints regarding accounting, internal accounting controls or auditing matters and will annually review the systems in place for the confidential, anonymous submission by employees of concerns regarding such matters. If a violation concerns a member of the Audit Committee, the investigation will be conducted under the guidance of the Nominating and Governance Committee of the Board.

WAIVERS OF THE CODE

Waivers of the Code may only be given in exceptional circumstances. Waivers for officers or members of the Board of Directors may only be made by the Board of Directors on the recommendation of either the Audit Committee or the Nominating and Governance Committee, whichever is applicable. Waivers will be promptly disclosed as required by applicable securities rules and regulations.

DISCIPLINE FOR NON-COMPLIANCE WITH THIS CODE

Disciplinary actions for violations of this Code can include oral or written reprimands, suspension or termination of employment or a potential civil lawsuit against you. The violation of laws, rules or regulations, which can subject the Company to fines and other penalties, may result in your criminal prosecution.

POLICIES REFERENCED IN THIS CODE

Insider Trading Policy  
Fitness for Duty Policy  
Disclosure and Confidentiality Policy  
Anti-Bribery and Anti-Corruption Policy  
Workplace Harassment and Discrimination Policy
CONTACT INFORMATION

If you need advice, or if you know of or suspect any violations of this Code, you should first consider speaking to your manager. If you are not comfortable doing this, or you are not satisfied with the response you receive, there are several other ways to report your concern.

WAYS TO SEEK ADVICE OR REPORT CONCERNS

- VP Legal and Corporate Secretary
  Jennifer Wagner
  jwagner@klgold.com
  647-361-0198 (Office)

- Vice President, Human Resources
  John Landmark
  jlandmark@klgold.com
  416-840-7884 (Office)

- Audit Committee of the Board - Write to:
  Kirkland Lake Gold Ltd.
  Royal Bank Plaza, South Tower
  200 Bay Street, Suite 3120
  Toronto, ON M5J 2J1
  Attention: Chair of the Audit Committee
  Private and Strictly Confidential
  whistleblower@klgold.com

- Executive Officers
  - President & Chief Executive Officer
    Anthony Makuch
    tmakuch@klgold.com
    416.840.7884
  - Chief Financial Officer
    David Soares
    dsoares@klgold.com
    416.840.7884

- ConfidenceLine
  - From Canada and the US Dial 1-800-661-9675, 24 hours a day, 365 days a year.
  - From Australia Dial 0011.80033881766, 24 hours a day, 365 days a year.
ACKNOWLEDGEMENT

I, _________________________________, hereby confirm that I have read and understand the Kirkland Lake Gold Ltd. Code of Conduct and Ethics (the “Code”), as well as the supporting polices referenced herein, including the Insider Trading Policy, the Fitness for Duty Policy and the Disclosure and Confidentiality Policy (the “Supporting Policies”) and I agree to conduct myself in accordance with the provisions contained in the Code and the Supporting Policies. I further understand that failure to do so may result in disciplinary action being taken against me, which may include dismissal.

Signed: ___________________________   Date: _________________
Anti-Bribery and Anti-Corruption Policy
Anti-Bribery and Anti-Corruption Policy

Kirkland Lake Gold Ltd. and its subsidiaries (together, “Kirkland Lake Gold,” the “Company,” or “we”) are committed to honest and ethical conduct. This theme is emphasized in our Code of Business Conduct and Ethics. We are committed to interacting with government officials, business partners, third parties and community stakeholders with integrity and in compliance with applicable anti-bribery and anti-corruption laws. This Anti-Bribery and Anti-Corruption Policy (this “Policy”) embodies this commitment, and we expect all Company directors, officers, and employees (“Kirkland Lake Gold Personnel” or “you”) to adhere to the Policy in all their activities related to their work with the Company.

As a company headquartered in Canada, with a stock exchange listing in Canada, the United States and Australia and operations in Canada and Australia, we are subject to a variety of local and international anti-bribery and anti-corruption laws. This includes the Canadian Corruption of Foreign Public Officials Act (“CFPOA”), the Criminal Code (Canada), the Criminal Code Act 1995 (Australia) and the United States Foreign Corrupt Practices Act of 1977, as amended (the “FCPA”). Violations of these statutes can result in criminal and/or civil penalties for the Company and involved individuals, in addition to damaging Kirkland Lake Gold’s reputation. In addition, violations of this Policy by Kirkland Lake Gold Personnel may result in disciplinary action.

This Policy is supplemental to the CFPOA, the Criminal Code, the Criminal Code Act, the FCPA and other anti-bribery legislation and compliance with this Policy does not restrict the obligations of all Kirkland Lake Gold Personnel to comply with the CFPOA, the Criminal Code, the Criminal Code Act, the FCPA, and other anti-bribery legislation, as applicable.

This Policy and any standards and procedures adopted thereunder shall be communicated to all Kirkland Lake Gold Personnel and External Contractors (as defined below), and other parties as appropriate.

Dealings with Government Officials: No Bribes, Kickbacks or Improper Payments

You are prohibited from offering, promising, providing or authorizing the transfer of anything of value to any government official (whether directly or indirectly through third parties) to get or keep business or otherwise to secure any improper advantage for Kirkland Lake Gold. Your belief that “that’s the way business is done” in some part of the world will not protect you or the Company from severe legal penalties that can apply to such conduct, nor will it protect you from disciplinary measures resulting from violations of this Policy, such as termination of employment.

You must be alert to bribery-related issues across the full range of ways in which our business interacts with government officials. This includes, but is not limited to: (i) granting any permit, license, approval or concession needed to acquire mineral rights or operate our business; (ii)
acting on tax, customs and similar matters; (iii) dealings with the military, the police and, in many cases, aboriginal leaders; and (iv) dealings with the judiciary in connection with any court proceedings.

**Government Official: Understanding the Scope**

For purposes of this Policy, “government officials” should be considered to include:

- Officials or employees of government departments or agencies at any level (such as legislators, environmental regulators, permitting and licensing personnel, tax authorities, police officials, port officials or agents, members of the military, judges, etc.), whether federal, provincial, territorial, regional, municipal or otherwise, including U.S., Canadian and foreign officials or employees and officials or employees of tribal, aboriginal or First Nations governments or groups;

- Employees of state-owned/controlled enterprises (e.g., state-owned contractors, vendors, or suppliers);

- Candidates for public office and officials of political parties;

- Employees of public international organizations like the World Bank, the International Monetary Fund, the World Health Organization, the United Nations, and the World Trade Organization; and

- Other people who act in an official capacity on behalf of any of the above.

In addition, offering, promising, or providing money or anything of value to a close family member or household member of a government official can constitute a bribe of the official.

Recognizing who is a government official can sometimes be challenging. Many wholly or partially state-owned or state-affiliated enterprises appear to be private rather than public in nature. It is your responsibility to know enough about the people with whom we are doing business or dealing in order to determine whether they are government officials under this Policy. When in doubt, consult with Legal.

**Anything of Value: Even Small Payments and Non-Cash Items Are Covered**

You should assume that “anything of value” will be interpreted broadly by enforcement officials, and it is interpreted broadly by the Company. It will include gifts, loans, rewards or an advantage or benefit of any kind, among other things. Even small payments or non-monetary gifts or favors can be considered a bribe. Depending on the value and the context, a gift, meal or entertainment; a contribution to an official’s favorite charity; use of an apartment, car or equipment; an internship; or a promise of future employment or business can each be a bribe. This Policy does not contain an exception for so-called “grease” or “facilitating” payments. They are prohibited.

**Gifts, Meals and Entertainment, and Sponsored Travel or Lodging for Government Officials**

Gift-giving, meals and entertainment, and sponsored travel or lodging can pose special challenges in dealing with government officials. While you cannot give anything of value to a government official to get or keep business or to otherwise gain an improper advantage, as
long as it is legal within their country, you may provide reasonable gifts and promotional items, meals and entertainment, and sponsored travel or lodging to government officials where there is a legitimate business purpose (i.e. if for the promotion, explanation or demonstration of the Company’s products and services) or the performance of an existing contract with the government, and the thing of value is not being provided in exchange for any action or inaction by the official. If you have any questions about whether a proposed gift or business entertainment is appropriate, you should consult your manager or Corporate Legal Counsel.

**Dealings with Private Parties: No Bribes, Kickbacks, or Other Inappropriate Payments**

Although significant portions of this Policy are focused on improper payments to government officials, it is important to understand that commercial or private sector bribery is also illegal in many jurisdictions, including Canada and the United States. Commercial bribery means providing a financial or other advantage to anyone (including a current or future business partner) to induce, obligate, reward or cause that person to behave improperly. It includes things like winning business as a result of having provided lavish entertainment or trips to individuals at the business partner with whom we are trying to do business. Engaging in commercial bribery, including giving or receiving kickbacks, is prohibited under this Policy.

If you have any questions about whether a proposed gift or business entertainment event is appropriate, you should consult your manager or the Corporate Legal Counsel.

**Emergency Exception**

This Policy does not prohibit payments to avoid a serious and imminent threat to your life or your physical safety. If at all possible, you should consult with the Corporate Legal Counsel before making any such payment. If that is not possible, you should report to Corporate Legal Counsel concerning the incident as soon as possible.

**Political Contributions**

Contributions to political parties and to candidates for public office are prohibited or tightly restricted in many countries, and, where not prohibited outright, can raise corruption concerns. Accordingly, you cannot make a political or campaign contribution in the name of or on behalf of Kirkland Lake Gold, or where the contribution will be associated with Kirkland Lake Gold, without advance approval from the Legal Department and/or the Corporate Legal Counsel.

**Charitable Contributions Involving Government Officials**

Any charitable contributions made by or on behalf of Kirkland Lake Gold must be based on legitimate philanthropic objectives. While it can be appropriate to make a donation to a community organization or a particular cause with the hope of generating generalized goodwill in the community or among a particular constituency, making a donation to a government official’s favored charity in exchange for favorable action by that official can constitute a bribe.

You must obtain advance approval from the relevant internal donations committee (if any) and the Legal Department and/or the Corporate Legal Counsel before making any donation for or on behalf of Kirkland Lake Gold to a charitable or community development organization in which a government official or a close family member of a government official has a
prominent role (for example, as a board member or trustee); where the donation is at the request of a government official; or where the organization is known or believed to be closely associated with a government official.

**Dealings with, Agents, Consultants, and Third-Party Representatives Acting on Behalf of Kirkland Lake Gold**

All of our agents, consultants, contractors, vendors, suppliers, advisors, and anyone else who acts on behalf of Kirkland Lake Gold, or who interacts with government agencies, government officials or state-owned enterprises on behalf of Kirkland Lake Gold (together, “External Contractors”), must be willing to conduct business on the basis of the principles set forth in this Policy.

External Contractors must undergo appropriate review and, as applicable, pre-approval as determined by the Legal Department and/or the Corporate Legal Counsel before being engaged. Guidelines concerning engaging an External Contractor, as well as additional requirements that may be imposed on an External Contractor, may be found in Kirkland Lake Gold’s *Code of Business Conduct and Ethics*.

**Acquiring Other Companies or Businesses or Participating in Joint Ventures**

Before acquiring another company or business, investing in another company or business, or participating in a joint venture, consortium or similar business arrangement, Kirkland Lake Gold will conduct appropriate due diligence, as determined by the Legal Department and/or the Corporate Legal Counsel, with respect to the other participants, including regarding compliance with anti-bribery and anti-corruption laws. Acquisitions and joint venture and similar agreements also should include contractual provisions regarding compliance with anti-bribery and anti-corruption laws and the principles in this Policy, as determined by the Legal Department.

**Addressing “Red Flags”**

It is important not only to avoid bribery and corruption, but also to avoid ignoring signs of bribery and corruption. Ignoring “red flags” can create significant legal and business risks for Kirkland Lake Gold and you, and, depending on the nature and seriousness of what was ignored, can lead to legal liability for you and Kirkland Lake Gold and may result in disciplinary measures being imposed on you by the Company.

If something about a transaction, business arrangement, or request from a government official or private party “looks bad” or “smells funny,” you are expected to ask questions and, where reassuring answers are not forthcoming, promptly refer the matter to the Legal Department and/or the Corporate Legal Counsel for review and guidance. For a non-exhaustive list of examples of “red flags,” please refer to Appendix A.

**Accurate Books and Records and Effective Internal Controls**

The Company shall maintain at all times accurate book and records to fulfill its obligations under the CFPOA and the FCPA, and to ensure accurate and effective reporting by the Company in accordance with applicable securities laws, the *Extractive Industry Transparency Measures Act* and other applicable laws.
As with receipts and expenditures generally, any expenditure of Kirkland Lake Gold funds or other use of Company resources must be accurately described in supporting documents and accurately entered in the Company’s books and records. You will not cause or permit any expenditure covered by this Policy to be handled “off the books,” mischaracterized or buried in some nondescrip account like “miscellaneous expenses.”

You will help Kirkland Lake Gold maintain a system of internal controls sufficient to ensure that our books and records accurately and fairly reflect, in reasonable detail, the Company’s transactions and disposions of assets; that the Company’s resources and assets are used only in accordance with directives and authorizations by the Board of Directors and management; and that checks and balances are employed so as to prevent the by-passing or overriding of these controls.

Violations of This Policy

This Policy applies to all Kirkland Lake Gold Personnel. Anyone who violates this Policy can subject both himself or herself and Kirkland Lake Gold to severe criminal and civil penalties. In a case where money or other things of value are provided or offered to a government official, the consequences can include liability under various anti-bribery and anti-corruption laws, potentially leading to substantial fines and even imprisonment. In addition, depending on the circumstances, violations of this Policy can cause substantial collateral harm to Kirkland Lake Gold in other areas, including the Company’s ability to obtain government licenses and permits and to conduct future business. Any violation of this Policy will be taken seriously and will lead to the imposition of appropriate disciplinary measures, including potential termination of employment or business relationship.

Reporting Violations and Asking Questions

If you know of or suspect a violation of this Policy, you must report it without delay, either directly to the Legal Department, Internal Audit or through the Kirkland Lake Gold Whistleblower Hotline (or as otherwise provided in the Whistle Blower Policy of the Company). Questions concerning the application of this Policy should be directed to the Legal Department. You are also encouraged to discuss questions and concerns about Kirkland Lake Gold’s business practices or policies with your management.

Amendments and Waivers

The Audit Committee will review this Policy on a periodic basis, evaluate its effectiveness, and update or amend this Policy as necessary. Under limited and exceptional circumstances, and for legitimate reasons, Legal or the Corporate Legal Counsel may approve proposed conduct or conduct that has occurred that deviates from this Policy. If you would like to discuss such an approval, please contact Legal.

Periodic Anti-Corruption Certification

Kirkland Lake Gold Personnel are required to certify periodically that they have read, understand and are complying with this Policy (and, as applicable, other Kirkland Lake Gold policies and procedures) and are not aware generally of any violations of this Policy or any applicable anti-bribery or anti-corruption laws, and certain External Contractors may be required to certify periodically that they are conducting business on the basis of the...
principles set forth in this Policy and are not aware generally of any violations of this Policy or any applicable anti-bribery or anti-corruption laws.

Reviewed and approved by the Board on December 30, 2019.
Appendix A Examples of “Red Flags”

Transactions and other business arrangements generally may not proceed if there are any “red flags” that have not been resolved and/or properly evaluated by Legal. Where you wish to proceed with a transaction or business arrangement that raises any “red flags,” you must resolve the “red flags” and/or refer the transaction or business arrangement to Legal for review and guidance, as appropriate under Kirkland Lake Gold’s policies and procedures.

- The other party has a reputation for bribery and/or corruption.
- The other party has refused to promise that it will comply with anti-bribery laws and/or anti-corruption laws.
- The other party has refused to warrant that it has not paid bribes or engaged in corruption.
- The other party seeks a commission that is excessive, is paid in cash, or is otherwise irregular.
- The other party seeks payment to an account in the name of another party or at a location unrelated to the transaction (for example, an offshore account).
- The other party is owned in part by a government official or his or her family member or otherwise has close ties to a government official.
- A government official suggests hiring a particular adviser to help obtain a government contract or address an issue that is within the jurisdiction of that official.
- The other party has requested that we prepare false invoices or any other type of false documentation.
- The other party is related to a government official who is in a position to grant a business advantage, or is involved in a business in which such official owns an interest.
- The other party insists that his or her identity not be disclosed to a government agency or enterprise.
- The other party refuses to identify its owners, partners, or principals.
- We are informed that a donation to a specific charity is needed to generate or facilitate government action.
- The justification for hiring a new agent or other intermediary is that he/she can obtain preferential treatment from a government official.
- The hiring of an agent or other intermediary is suggested to perform tasks that require no special knowledge or skills, or could easily be performed by
our employees.

- There is substantial or extravagant “wining and dining” of government officials.
- There is sponsored travel for government officials and/or family members where there is no clear and legitimate business purpose.
- Relatives of important government officials are on the payroll of the other party.
- The other party has relevant expenses that cannot be explained or that lack supporting documentation.
- The other party has “off the books” receipts or expenses that are relevant to the contemplated transaction.
- The other party has poor internal controls or record-keeping practices that are relevant to the contemplated transaction.
APPENDIX 5

Canadian Extractive Sector Transparency Measures Act Report
### Extractive Sector Transparency Measures Act - Annual Report

<table>
<thead>
<tr>
<th>Reporting Entity Name</th>
<th>Kirkland Lake Gold Ltd.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reporting Year From</td>
<td>1/1/2019</td>
</tr>
<tr>
<td>To:</td>
<td>12/31/2019</td>
</tr>
<tr>
<td>Date submitted</td>
<td>7/2/2020</td>
</tr>
<tr>
<td>Reporting Entity ESTMA Identification Number</td>
<td>E936050</td>
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<tr>
<td>Other Subsidiaries Included (optional field)</td>
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<tr>
<td>For Consolidated Reports - Subsidiary Reporting Entities Included in Report:</td>
<td>E597613 Kirkland Lake Gold Inc., E246746 St Andrew Goldfields Ltd, E425485 Fosterville Gold Mine Pty Ltd., E573013 NT Mining Operations Pty Ltd., E680819 Detour Gold Corporation</td>
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<tr>
<td>Not Substituted</td>
<td></td>
</tr>
<tr>
<td>Attestation by Reporting Entity</td>
<td>In accordance with the requirements of the ESTMA, and in particular section 9 thereof, I attest I have reviewed the information contained in the ESTMA report for the entity(ies) listed above. Based on my knowledge, and having exercised reasonable diligence, the information in the ESTMA report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.</td>
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<table>
<thead>
<tr>
<th>Full Name of Director or Officer of Reporting Entity</th>
<th>David Soares</th>
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<tr>
<td>Position Title</td>
<td>Chief Financial Officer</td>
</tr>
<tr>
<td>Date</td>
<td>6/22/2020</td>
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### Payments by Payee

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<th>Country</th>
<th>Payee Name 1</th>
<th>Departments, Agency, etc... within Payee that Received Payments 2</th>
<th>Taxes</th>
<th>Royalties</th>
<th>Fees</th>
<th>Production Entitlements</th>
<th>Bonuses</th>
<th>Dividends</th>
<th>Infrastructure Improvement Payments</th>
<th>Total Amount paid to Payee</th>
<th>Notes 3</th>
<th>Notes 4</th>
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<td>Mineral lease rent, Exploration lease rents</td>
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</tr>
</tbody>
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**Additional Notes:**

For Australia and Canada, the local currencies have been converted at the December 31, 2019 year-end closing exchange rate sourced from Thomson Reuters, 0.7021 USD to AUD and 0.7701 USD to CAD.
### Extractive Sector Transparency Measures Act - Annual Report

**Reporting Year:** From: 1/1/2019 To: 12/31/2019  
**Currency of the Report:** USD  
**Reporting Entity Name:** Kirkland Lake Gold Ltd.  
**Reporting Entity ESTMA Identification Number:** E936050  
**Subsidiary Reporting Entities (if necessary):** E597613 Kirkland Lake Gold Inc., E246746 St Andrew Goldfields Ltd, E425485 Fosterville Gold Mine Pty Ltd., E373513 NT Mining Operations Pty Ltd., E680819 Detour Gold Corporation

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<thead>
<tr>
<th>Country</th>
<th>Project Name</th>
<th>Taxes</th>
<th>Royalties</th>
<th>Fees</th>
<th>Production Entitlements</th>
<th>Bonuses</th>
<th>Dividends</th>
<th>Infrastructure Improvement Payments</th>
<th>Total Amount paid by Project</th>
<th>Notes</th>
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<td>14,510,000</td>
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<td>13,290,000</td>
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</tr>
<tr>
<td>Australia</td>
<td>Northern Territory</td>
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<td>330,000</td>
<td></td>
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<td></td>
<td></td>
<td>330,000</td>
<td>Mineral lease rent. Exploration lease rents</td>
</tr>
</tbody>
</table>

**Additional Notes:** 3: For Australia and Canada, the local currencies have been converted at the December 31, 2019 year-end closing exchange rate sourced from Thomson Reuters, 0.7021 USD to AUD and 0.7701 USD to CAD.
APPENDIX 6

Communities and Stakeholder Standard
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.
APPENDIX 7

Community Feedback Standard
COMMUNITY FEEDBACK STANDARD

PURPOSE

This Standard sets the minimum requirements to adequately manage and report on community feedback and grievances relating to our business activities. Fulfilling these requirements should provide a fair, accessible, effective and timely mechanism for tracking and resolving feedback and grievances pertaining to our operations.

1. Planning, Design, Implementation
1.1. Sites shall develop a procedure to register and record a grievance, acknowledge receipt, set a reasonable time frame to investigate and resolve the grievance.
1.2. The procedure will outline a process for categorizing and assigning ownership of grievances.
1.3. Intake for grievances must be accessible through sufficient communication methods to ensure the format does not preclude participation.
1.4. The procedure must outline a process for a multi-tiered escalation of the grievance if necessary, with ultimate responsibility resting with an appropriate member of senior management.
1.5. Grievances must be logged, assigned, and processed using a consistent methodology. All activities must be documented in an electronic and accessible format.
1.6. Sites shall ensure appropriate and routine communication to a complainant to inform the complainant of the status of the review of the grievance. Formal meetings and communications shall be documented, including a process where meeting minutes are shared with the attendees. Sites will ensure there is a process for formal records of submitted grievances to be made available to complainants. Sites will seek confirmation from the complainant regarding closure and resolution of complaint and will note the complainant’s response in the record.
1.7. Sites shall ensure that stakeholders are informed and, when necessary, trained on how to utilize the complaint and grievance mechanisms.
1.8. Sites will consult with Indigenous communities, where relevant, on measures to make procedures culturally-appropriate for Indigenous community concerns.

2. Performance Monitoring
2.1. Sites will monitor and evaluate how the mechanism is functioning, including keeping track of grievances received, those resolved or left outstanding.
2.2. Senior management will review the procedure annually for effectiveness and results achieved to ensure continuous improvement.
Supplier Code of Conduct
SUPPLIER CODE OF CONDUCT

At Kirkland Lake Gold, we believe that the company and its subsidiaries (collectively, “KL Gold”) have both an ethical and a business imperative to be responsible community members, locally, regionally, nationally and internationally. This responsibility includes establishing a set of minimum standards of conduct for suppliers of goods and services to KL Gold. KL Gold wants to do business with suppliers that share our commitment to corporate responsibility. This document sets out the standards by which KL Gold requires its suppliers to conduct their business. KL Gold suppliers are required to take reasonable measures with their own suppliers to ensure that the standards set out in this document are implemented, where relevant.

Compliance with Laws- Suppliers must:
- Operate their businesses in accordance with all applicable laws, codes, rules and regulations of the jurisdictions in which they operate.

Safety Culture - Suppliers must:
- Comply with all health and safety laws;
- Provide a high standard of care as it relates to the health, safety, and well-being of their employees, suppliers, customers, communities and others who might be affected by their actions; and
- Comply with KL Gold’s Health & Safety policies during any visit to, or operations on, a KL Gold site.

Human Rights - Suppliers must:
- Support and respect the International Bill of Human Rights (which includes the Universal Declaration of Human Rights);
- Ensure they conduct themselves in a manner consistent with the protection of internationally recognized human rights, and are not complicit in human rights abuses, including by tolerating abuse, remaining inactive or silent in the face of abuse, or knowingly aiding or encouraging activities that contribute to the perpetration of abuse.

Labour Standards - Suppliers must:
- Support and act in accordance with the International Labour Organisation Declaration on Fundamental Principles and Rights at Work;
- Uphold freedom of association and the effective recognition of the right to collective bargaining;
- Support the elimination of all forms of modern slavery, including forced and compulsory labour, human trafficking with a view to exploitation, and child labour; and
- Establish systems to ensure compliance with international standards and laws on modern slavery and the rights of children.
- Alert KL Gold immediately if they become aware of any situation that is or could reasonably be construed as a violation of modern slavery laws or standards.

Environment - Suppliers must:
- Meet or exceed all environmental laws where they operate and actively manage any environmental risks due to their activities; and
- Comply with KL Gold’s Environmental policies during any visit to, or operations on, a KL Gold site.

Local Procurement and Employment- Suppliers must:
- To the extent practicable, employ local works and source goods and services locally.

Discrimination- Suppliers must:
- Not discriminate based on race, colour, religion, nationality, gender, ethnicity, age, marital status, creed, sexual orientation, political beliefs, pregnancy, disability or any other basis prohibited by law or inconsistent with international agreements.

Conflict of Interest- Suppliers must:
Alert KL Gold immediately if they become aware of any situation that is or could reasonably be expected to give rise to a conflict of interest between Supplier and KL Gold.

Act in a fair and impartial manner, and avoid both real and perceived conflicts of interest in the business they conduct with or on behalf of KL Gold.

Insider Trading- Suppliers must:
- Comply with all insider trading laws and not trade in the securities of KL Gold during any period when they have become aware of confidential or material undisclosed information of KL Gold.

Confidentiality- Suppliers must:
- Maintain all proprietary information of KL Gold in the strictest confidence.

Gifts and Entertainment- Suppliers must:
- Not provide any personal gifts, favours or other compensation to a KL Gold employee that are intended to influence, or appear to influence, a business decision.

Demonstration of Compliance- Suppliers must:
- Be able to demonstrate compliance with this Code at the request and to the satisfaction of KL Gold and provide reasonable assistance to KL Gold during any investigation into the Suppliers compliance with this Code.

Business Ethics – Suppliers must:
- Be committed to the highest standards of ethical conduct when dealing with workers, suppliers, government and regulatory authorities, and KL Gold. Any and all forms of illegal or inappropriate activity, including, but not limited to, corruption, misrepresentation, extortion, embezzlement or bribery, are strictly prohibited and may result in termination of any or all agreements.

COMPLIANCE AND REPORTING

In addition to complying with these standards, while on location at KL Gold properties, Suppliers must comply with applicable KL Gold policies and procedures, as well as standards as may be more fully defined in their contract. KL Gold is publicly listed in 3 countries (Canada, United States, and Australia) requiring compliance with various reporting standards, including International Financial Reporting Standards such as IFRS16 Leases; Suppliers must aware of and support KL Gold’s reporting, as applicable, and must be transparent with the services they provide to KL Gold.

Suppliers, including their officers, management, and personnel, are expected to report suspected violations of KL Gold’s Supplier Code of Conduct and any KL Gold policies by any Supplier or KL Gold personnel. Suppliers can report violations directly to a KL Gold representative or in accordance with KL Gold’s Whistleblower Policy.

Suppliers are expected to have an internal process whereby complaints can be raised, and investigations can be undertaken for violations of this Code. When complaints relating to this Code are raised, Suppliers must promptly investigate.

KL Gold will periodically review Suppliers’ conformance with these standards. Once every year, Suppliers are required to reaffirm their understanding and agreement to comply with this Code (as may be amended from time to time).

This Code forms part of all agreements between KL Gold and its Suppliers. Suppliers are required to comply with this Code and to ensure that their employees and representatives understand and comply with this Code. Failure to adhere to this Code may be grounds for termination of the Supplier relationship and any related agreements.
APPENDIX 9

Human Rights Policy
Kirkland Lake Gold respects the rights, cultures, customs and values of the people and communities living near our projects, our employees, and those impacted by our actions.

The Company is committed to improving our systems for preventing human rights-related impacts, and for contributing to sustainable development by delivering economic, social and environmental benefits for our stakeholders. This commitment is reflected in operational policies and procedures and are embedded throughout how we do business.

In fulfilling our mission, we are guided by several principles that help define our approach:

- We are committed and always strive to act in accordance with the International Bill of Human Rights (which includes the Universal Declaration of Human Rights) and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work.
- We do not tolerate violations of human rights committed by our employees, affiliates, or any third parties acting on our behalf or related to any aspect of one of our operations.
- We do not tolerate the use of child labour, prison labour, or any form of forced labour, slavery or servitude.
- We believe in fair employment practices and in a workplace in which all individuals are treated with dignity and respect. We do not tolerate discrimination against individuals on the basis of race, colour, gender, religion, political opinion, ethnicity, age, nationality or social origin, sexual orientation, or union membership.
- We aim to pay all employees and contractors fairly. We will enforce working hours to the best of our ability, and provide fairly compensated overtime and pay for periodic holidays and time off.
- We respect the freedom of expression and right to associate of our employees and contractors, including their right to establish and to join organizations of their own choosing to bargain collectively and advance their occupational interests without our previous authorization or unreasonable interference.
- We do not tolerate threats, intimidation, or attacks against human rights defenders.
- In our relationships with host governments, contractors and third-party service providers, we do our utmost to avoid being complicit in adverse human rights impacts, including benefitting from the human rights violations caused by others.
- We monitor and try to continuously improve our human rights performance.
Social Responsibility Policy
Kirkland Lake Gold is committed to making a positive impact by creating meaningful opportunities for our employees and local suppliers, and by facilitating lasting improvements in the communities in which we operate.

Kirkland Lake Gold believes that Social Responsibility is essential to operational and financial success and is committed to developing relationships based on open and honest communication with our stakeholders. To further our commitment to Social Responsibility, Kirkland Lake Gold endeavours to:

- **Meet or Exceed** all applicable laws, regulations, and Kirkland Lake Gold company standards.
- **Acknowledge** cultural and other human rights and ensure all levels of the workforce understand and respect such rights.
- **Integrate** social responsibility into our decisions and activities.
- **Act Ethically and Respectfully** regarding Indigenous rights, cultural beliefs and aspirations.
- **Understand, encourage and promote** cross-cultural awareness.
- **Engage** our stakeholders regarding their values in connection with the development, operation and closure of mineral projects.
- **Communicate** openly and honestly with respect to the Company’s performance in a timely manner.
- **Maintain** ongoing dialogues based on transparency, respect and good faith.

To fulfil our commitment to social responsibility, we will aim to continually improve our performance by regularly:

- reviewing objectives and targets;
- engaging with our employees and stakeholders to find improvements that benefit both local economic development and our shareholders;
- identifying and managing significant social impacts, risks and opportunities;
- measuring and reporting performance transparently against objectives and targets; and
- communicating this policy to our employees, contractors, suppliers and visitors while also making it available to the public.

June 17, 2020

Anthony Makuch
President and CEO
Workplace Violence, Harassment & 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.

June 17, 2020

Anthony Makuch
President and CEO
Annual Report to the Workplace Gender Equality Agency
Public report

2019-20

Submitted by

Legal Name: Fosterville Gold Mine Pty Ltd
## Organisation and contact details

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All organisations covered by this report

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## Workplace profile

### Manager

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Date submitted: Unique report number: mnpmfuxsf
## Workplace profile

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Reporting questionnaire

Gender equality indicator 1: Gender composition of workforce

This indicator seeks information about the gender composition of relevant employers in a standardised format, to enable the aggregation of data across and within industries. The aggregated data in your workplace profile assists relevant employers in understanding the characteristics of their workforce, including in relation to occupational segregation, the position of women and men in management within their industry or sector, and patterns of potentially insecure employment.

NB. IMPORTANT:

• References to the Act mean the Workplace Gender Equality Act 2012.
• A formal ‘policy’ and/or ‘formal strategy’ in this questionnaire refers to formal policies and/or strategies that are either standalone or contained within another formal policy/formal strategy.
• Data provided in this reporting questionnaire covers the TOTAL reporting period from 1 April 2019 to 31 March 2020. (This differs from the workplace profile data which is taken at a point-in-time during the reporting period).
• Answers need to reflect ALL organisations covered in this report.
• If you select “NO, Insufficient resources/expertise” to any option, this may cover human or financial resources.

1. Do you have formal policies and/or formal strategies in place that SPECIFICALLY SUPPORT GENDER EQUALITY relating to the following?

1.1 Recruitment

☒ Yes (select all applicable answers)
☐ Policy
☐ Strategy
☐ No (you may specify why no formal policy or formal strategy is in place)
☐ Currently under development, please enter date this is due to be completed
☐ Insufficient resources/expertise
☐ Not a priority

1.2 Retention

☒ Yes (select all applicable answers)
☐ Policy
☐ Strategy
☐ No (you may specify why no formal policy or formal strategy is in place)
☐ Currently under development, please enter date this is due to be completed
☐ Insufficient resources/expertise
☐ Not a priority

1.3 Performance management processes

☒ Yes (select all applicable answers)
☐ Policy
☐ Strategy
☐ No (you may specify why no formal policy or formal strategy is in place)
☐ Currently under development, please enter date this is due to be completed
☐ Insufficient resources/expertise
☐ Not a priority
1.4 Promotions
☑ Yes (select all applicable answers)
   □ Policy
   ☒ Strategy

☐ No (you may specify why no formal policy or formal strategy is in place)
   □ Currently under development, please enter date this is due to be completed
   □ Insufficient resources/expertise
   □ Not a priority

1.5 Talent identification/identification of high potentials
☐ Yes (select all applicable answers)
   □ Policy
   ☒ Strategy

☑ No (you may specify why no formal policy or formal strategy is in place)
   □ Currently under development, please enter date this is due to be completed
   □ Insufficient resources/expertise
   □ Not a priority

1.6 Succession planning
☐ Yes (select all applicable answers)
   □ Policy
   ☒ Strategy

☑ No (you may specify why no formal policy or formal strategy is in place)
   □ Currently under development, please enter date this is due to be completed
   □ Insufficient resources/expertise
   □ Not a priority

1.7 Training and development
☐ Yes (select all applicable answers)
   □ Policy
   ☒ Strategy

☑ No (you may specify why no formal policy or formal strategy is in place)
   □ Currently under development, please enter date this is due to be completed
   □ Insufficient resources/expertise
   □ Not a priority

1.8 Key performance indicators for managers relating to gender equality
☐ Yes (select all applicable answers)
   □ Policy
   ☒ Strategy

☑ No (you may specify why no formal policy or formal strategy is in place)
   □ Currently under development, please enter date this is due to be completed
   □ Insufficient resources/expertise
   □ Not a priority

1.9 Gender equality overall
☐ Yes (select all applicable answers)
   □ Policy
   ☒ Strategy

☑ No (you may specify why no formal policy or formal strategy is in place)
   □ Currently under development, please enter date this is due to be completed
   □ Insufficient resources/expertise
   □ Not a priority
1.10 How many employees were promoted during the reporting period against each category below?

IMPORTANT: Because promotions are included in the number of appointments in Q1.11, the number of promotions should never exceed appointments.

<table>
<thead>
<tr>
<th></th>
<th>Managers</th>
<th></th>
<th>Non-managers</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Female</td>
<td>Male</td>
<td>Female</td>
<td>Male</td>
</tr>
<tr>
<td>Permanent/ongoing full-time employees</td>
<td>2</td>
<td>6</td>
<td>17</td>
<td>82</td>
</tr>
<tr>
<td>Permanent/ongoing part-time employees</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>Fixed-term contract full-time employees</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Fixed-term contract part-time employees</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Casual employees</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

1.11 How many appointments in total were made to manager and non-manager roles (based on WGEA-defined managers/non-managers) during the reporting period (add the number of external appointments and internal promotions together)?

<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Number of appointments made to MANAGER roles (including promotions)</td>
<td>Female</td>
<td>4</td>
</tr>
<tr>
<td></td>
<td>Male</td>
<td>19</td>
</tr>
<tr>
<td>Number of appointments made to NON-MANAGER roles (including promotions)</td>
<td>Female</td>
<td>75</td>
</tr>
<tr>
<td></td>
<td>Male</td>
<td>404</td>
</tr>
</tbody>
</table>

1.12 How many employees resigned during the reporting period against each category below?

<table>
<thead>
<tr>
<th></th>
<th>Managers</th>
<th></th>
<th>Non-managers</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Female</td>
<td>Male</td>
<td>Female</td>
<td>Male</td>
</tr>
<tr>
<td>Permanent/ongoing full-time employees</td>
<td>0</td>
<td>4</td>
<td>17</td>
<td>64</td>
</tr>
<tr>
<td>Permanent/ongoing part-time employees</td>
<td>0</td>
<td>0</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>Fixed-term contract full-time employees</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Fixed-term contract part-time employees</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Casual employees</td>
<td>0</td>
<td>0</td>
<td>2</td>
<td>8</td>
</tr>
</tbody>
</table>

1.13 If your organisation would like to provide additional information relating to gender equality indicator 1, please do so below.

Gender equality indicator 2: Gender composition of governing bodies

Gender composition of governing bodies is an indicator of gender equality at the highest level of organisational leadership and decision-making. This gender equality indicator seeks information on the representation of women and men on governing bodies. The term “governing body” in relation to a relevant employer is broad and depends on the nature of your organisation. It can mean the board of directors, trustees, committee of management, council or other governing authority of the employer.

2. The organisation(s) you are reporting on will have a governing body. In the Act, governing body is defined as “the board of directors, trustees, committee of management, council or other governing authority of the employer”. This question relates to the highest governing body for your Australian entity, even if it is located overseas.

2.1 Please answer the following questions relating to each governing body covered in this report.
2.1a.1 Organisation name?

Kirkland Lake Gold Ltd

2.1b.1 What gender is the Chair on this governing body (if the role of the Chair rotates, enter the gender of the Chair at your last meeting)?

<table>
<thead>
<tr>
<th>Gender</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Female</td>
<td>0</td>
</tr>
<tr>
<td>Male</td>
<td>1</td>
</tr>
</tbody>
</table>

2.1c.1 How many other members are on this governing body (excluding the Chair/s)?

<table>
<thead>
<tr>
<th>Gender</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Female</td>
<td>2</td>
</tr>
<tr>
<td>Male</td>
<td>5</td>
</tr>
</tbody>
</table>

2.1d.1 Has a target been set to increase the representation of women on this governing body?

☑ No (you may specify why a target has not been set)

☐ Governing body/board has gender balance (e.g. 40% women/40% men/20% either)
☐ Currently under development, please enter date this is due to be completed
☐ Insufficient resources/expertise
☐ Do not have control over governing body/board appointments (provide details why):
☐ Not a priority
☐ Other (provide details):

2.1g.1 Are you reporting on any other organisations in this report?

☐ Yes
☑ No

2.2 Do you have a formal selection policy and/or formal selection strategy for governing body members for ALL organisations covered in this report?

☑ Yes (select all applicable answers)

☒ Policy
☒ Strategy

☐ No (you may specify why no formal selection policy or formal selection strategy is in place)

☐ In place for some governing bodies
☐ Currently under development, please enter date this is due to be completed
☐ Insufficient resources/expertise
☐ Do not have control over governing body appointments (provide details why):
☐ Not a priority
☐ Other (provide details):

2.3 Does your organisation operate as a partnership structure (i.e. select NO if your organisation is an “incorporated” entity - Pty Ltd, Ltd or Inc; or an “unincorporated” entity)?

☐ Yes
☑ No
2.5 If your organisation would like to provide additional information relating to gender equality indicator 2, please do so below.

Gender equality indicator 3: Equal remuneration between women and men

Equal remuneration between women and men is a key component of improving women’s economic security and progressing gender equality.

3. Do you have a formal policy and/or formal strategy on remuneration generally?

- Yes (select all applicable answers)
  - Policy
  - Strategy
- No (you may specify why no formal policy or formal strategy is in place)
  - Currently under development, please enter date this is due to be completed
  - Insufficient resources/expertise
  - Salaries set by awards/industrial or workplace agreements
  - Non-award employees paid market rate
  - Not a priority
  - Other (provide details):

4. Have you analysed your payroll to determine if there are any remuneration gaps between women and men (i.e. conducted a gender pay gap analysis)?

- Yes - the most recent gender remuneration gap analysis was undertaken:
  - Within last 12 months
  - Within last 1-2 years
  - More than 2 years ago but less than 4 years ago
  - Other (provide details):
- No (you may specify why you have not analysed your payroll for gender remuneration gaps)
  - Currently under development, please enter date this is due to be completed
  - 31/03/2021
  - Insufficient resources/expertise
  - Salaries for ALL employees (including managers) are set by awards or industrial agreements AND there is no room for discretion in pay changes (for example because pay increases occur only when there is a change in tenure or qualifications)
  - Salaries for SOME or ALL employees (including managers) are set by awards or industrial agreements and there is room for discretion in pay changes (because pay increases can occur with some discretion such as performance assessments)
  - Non-award employees paid market rate
  - Not a priority
  - Other (provide details):

4.2 If your organisation would like to provide additional information relating to gender equality indicator 3, please do so below:

Gender equality indicator 4: Flexible working and support for employees with family and caring responsibilities

This indicator will enable the collection and use of information from relevant employers about the availability and utility of employment terms, conditions and practices relating to flexible working arrangements for employees and to working arrangements supporting employees with family or caring responsibilities. One aim of this indicator is to improve the capacity of women and men...
to combine paid work and family or caring responsibilities through such arrangements. The achievement of this goal is fundamental to gender equality and to maximising Australia’s skilled workforce.

5. A “PRIMARY CARER” is the member of a couple or a single carer, REGARDLESS OF GENDER, identified as having greater responsibility for the day-to-day care of a child.

Do you provide EMPLOYER FUNDED paid parental leave for PRIMARY CARERS that is available for women AND men, in addition to any government funded parental leave scheme for primary carers?

☐ Yes. (Please indicate how employer funded paid parental leave is provided to the primary carer):
  ☐ By paying the gap between the employee’s salary and the government’s paid parental leave scheme
  ☐ By paying the employee’s full salary (in addition to the government’s paid scheme), regardless of the period of time over which it is paid. For example, full pay for 12 weeks or half pay for 24 weeks
  ☒ As a lump sum payment (paid pre- or post- parental leave, or a combination)

☐ No, we offer paid parental leave for primary carers that is available to women ONLY (e.g. maternity leave). (Please indicate how employer funded paid parental leave is provided to women ONLY):
  ☐ By paying the gap between the employee’s salary and the government’s paid parental leave scheme
  ☐ By paying the employee’s full salary (in addition to the government’s paid scheme), regardless of the period of time over which it is paid. For example, full pay for 12 weeks or half pay for 24 weeks

☐ No, we offer paid parental leave for primary carers that is available to men ONLY. (Please indicate how employer funded paid parental leave is provided to men ONLY):
  ☐ By paying the gap between the employee’s salary and the government’s paid parental leave scheme
  ☐ By paying the employee’s full salary (in addition to the government’s paid scheme), regardless of the period of time over which it is paid. For example, full pay for 12 weeks or half pay for 24 weeks
  ☒ As a lump sum payment (paid pre- or post- parental leave, or a combination)

☐ No, not available (you may specify why this leave is not provided)

Currently under development, please enter date this is due to be completed 31/03/2021

Insufficient resources/expertise
Government scheme is sufficient
Not a priority
Other (provide details):

6. A “SECONDARY CARER” is a member of a couple or a single carer, REGARDLESS OF GENDER, who is not the primary carer.

Do you provide EMPLOYER FUNDED paid parental leave for SECONDARY CARERS that is available for men and women, in addition to any government funded parental leave scheme for secondary carers?

☐ Yes
☐ No, we offer paid parental leave for SECONDARY CARERS that is available to men ONLY (e.g. paternity leave)
☐ No, we offer paid parental leave for SECONDARY CARERS that is available to women ONLY
☒ No (you may specify why employer funded paid parental leave for secondary carers is not paid)

Currently under development, please enter date this is due to be completed 31/03/2021

Insufficient resources/expertise
Government scheme is sufficient
Not a priority
Other (provide details):

7. How many MANAGERS have taken parental leave during the reporting period (paid and/or unpaid)? Include employees still on parental leave, regardless of when it commenced.

<table>
<thead>
<tr>
<th></th>
<th>Primary carer's leave</th>
<th>Secondary carer's leave</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Female</td>
<td>Male</td>
</tr>
<tr>
<td>Managers</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

7.1 How many NON-MANAGERS have taken parental leave during the reporting period (paid and/or unpaid)? Include employees still on parental leave, regardless of when it commenced.
8. How many MANAGERS, during the reporting period, ceased employment before returning to work from parental leave, regardless of when the leave commenced?
   • Include those where parental leave was taken continuously with any other leave type. For example, where annual leave or any other paid or unpaid leave is also taken at that time.
   • ‘Ceased employment’ means anyone who has exited the organisation for whatever reason, including resignations, redundancies and dismissals.

<table>
<thead>
<tr>
<th></th>
<th>Female</th>
<th>Male</th>
</tr>
</thead>
<tbody>
<tr>
<td>Managers</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

8.1 How many NON-MANAGERS, during the reporting period, ceased employment before returning to work from parental leave, regardless of when the leave commenced?
   • Include those where parental leave was taken continuously with any other leave type. For example, where annual leave or any other paid or unpaid leave is also taken at that time.
   • ‘Ceased employment’ means anyone who has exited the organisation for whatever reason, including resignations, redundancies and dismissals.

<table>
<thead>
<tr>
<th></th>
<th>Female</th>
<th>Male</th>
</tr>
</thead>
<tbody>
<tr>
<td>Non-managers</td>
<td>1</td>
<td>0</td>
</tr>
</tbody>
</table>

9. Do you have a formal policy and/or formal strategy on flexible working arrangements?

☐ Yes (select all applicable answers)
   ☐ Policy
   ☐ Strategy
☐ No (you may specify why no formal policy or formal strategy is in place)
   ☐ Currently under development, please enter date this is due to be completed
   ☐ Insufficient resources/expertise
   ☐ Don't offer flexible arrangements
   ☐ Not a priority
   ☐ Other (provide details):

10. Do you have a formal policy and/or formal strategy to support employees with family or caring responsibilities?

☐ Yes (select all applicable answers)
   ☐ Policy
   ☐ Strategy
☐ No (you may specify why no formal policy or formal strategy is in place)
   ☐ Currently under development, please enter date this is due to be completed
   ☐ Insufficient resources/expertise
   ☐ Included in award/industrial or workplace agreement
   ☐ Not a priority
   ☐ Other (provide details):

11. Do you offer any other support mechanisms, other than leave, for employees with family or caring responsibilities (e.g., employer-subsidised childcare, breastfeeding facilities)?

☐ Yes
☐ No (you may specify why non-leave based measures are not in place)
   ☐ Currently under development, please enter date this is due to be completed
   ☐ Insufficient resources/expertise
   ☐ Not a priority
   ☐ Other (provide details):
11.1 Please select what support mechanisms are in place and if they are available at all worksites.

- Where only one worksite exists, for example a head-office, select “Available at all worksites”.

☐ Employer subsidised childcare
  ☐ Available at some worksites only
  ☑ Available at all worksites

☐ On-site childcare
  ☐ Available at some worksites only
  ☑ Available at all worksites

☐ Breastfeeding facilities
  ☑ Available at some worksites only
  ☑ Available at all worksites

☐ Childcare referral services
  ☐ Available at some worksites only
  ☑ Available at all worksites

☐ Internal support networks for parents
  ☐ Available at some worksites only
  ☑ Available at all worksites

☐ Return to work bonus (only select this option if the return to work bonus is NOT the balance of paid parental leave when an employee returns from leave)
  ☐ Available at some worksites only
  ☑ Available at all worksites

☐ Information packs to support new parents and/or those with elder care responsibilities
  ☐ Available at some worksites only
  ☑ Available at all worksites

☐ Referral services to support employees with family and/or caring responsibilities
  ☑ Available at some worksites only
  ☑ Available at all worksites

☐ Targeted communication mechanisms, for example intranet/forums
  ☑ Available at some worksites only
  ☑ Available at all worksites

☐ Support in securing school holiday care
  ☐ Available at some worksites only
  ☑ Available at all worksites

☐ Coaching for employees on returning to work from parental leave
  ☐ Available at some worksites only
  ☑ Available at all worksites

☐ Parenting workshops targeting mothers
  ☐ Available at some worksites only
  ☑ Available at all worksites

☐ Parenting workshops targeting fathers
  ☐ Available at some worksites only
  ☑ Available at all worksites

☐ None of the above, please complete question 11.2 below

12. Do you have a formal policy and/or formal strategy to support employees who are experiencing family or domestic violence?

☐ Yes (select all applicable answers)
  ☐ Policy
  ☐ Strategy

☒ No (you may specify why no formal policy or formal strategy is in place)
  ☐ Currently under development, please enter date this is due to be completed
  ☐ Insufficient resources/expertise
  ☐ Included in award/industrial or workplace agreements
  ☐ Not aware of the need
  ☐ Not a priority
  ☐ Other (please provide details):

13. Other than a formal policy and/or formal strategy, do you have any support mechanisms in place to support employees who are experiencing family or domestic violence?

☒ Yes (select all applicable answers)
14. Where any of the following options are available in your workplace, are those option/s available to both women AND men?

- flexible hours of work
- compressed working weeks
- time-in-lieu
- telecommuting
- part-time work
- job sharing
- carer’s leave
- purchased leave
- unpaid leave.

Options may be offered both formally and/or informally. For example, if time-in-lieu is available to women formally but to men informally, you would select NO.

☐ Yes, the option/s in place are available to both women and men.
☐ No, some/all options are not available to both women AND men.

14.1 Which options from the list below are available? Please tick the related checkboxes.

- Unticked checkboxes mean this option is NOT available to your employees.

<table>
<thead>
<tr>
<th></th>
<th>Managers</th>
<th>Non-managers</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Formal</td>
<td>Informal</td>
</tr>
<tr>
<td>Flexible hours of work</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>Compressed working weeks</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>Time-in-lieu</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>Telecommuting</td>
<td>☐</td>
<td>☒</td>
</tr>
<tr>
<td>Part-time work</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>Job sharing</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>Carer’s leave</td>
<td>☒</td>
<td>☐</td>
</tr>
<tr>
<td>Purchased leave</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Unpaid leave</td>
<td>☒</td>
<td>☐</td>
</tr>
</tbody>
</table>

14.3 You may specify why any of the above options are NOT available to your employees.

☐ Currently under development, please enter date this is due to be completed
☐ Insufficient resources/expertise
14.4 If your organisation would like to provide additional information relating to gender equality indicator 4, please do so below:

Gender equality indicator 5: Consultation with employees on issues concerning gender equality in the workplace

This gender equality indicator seeks information on what consultation occurs between employers and employees on issues concerning gender equality in the workplace.

15. Have you consulted with employees on issues concerning gender equality in your workplace?

☑ Yes
☐ No (you may specify why you have not consulted with employees on gender equality)

☐ Not needed (provide details why):
☐ Insufficient resources/expertise
☐ Not a priority
☐ Other (provide details):

15.1 How did you consult with employees on issues concerning gender equality in your workplace?

☑ Survey
☑ Consultative committee or group
☑ Focus groups
☐ Exit interviews
☐ Performance discussions
☐ Other (provide details):

15.2 Who did you consult?

☐ All staff
☐ Women only
☐ Men only
☑ Human resources managers
☐ Management
☐ Employee representative group(s)
☐ Diversity committee or equivalent
☐ Women and men who have resigned while on parental leave
☑ Other (provide details):
   All women on-site also consulted

15.3 If your organisation would like to provide additional information relating to gender equality indicator 5, please do so below.

Diversity Committee developed

Gender equality indicator 6: Sex-based harassment and discrimination

The prevention of sex-based harassment and discrimination (SBH) has been identified as important in improving workplace participation. Set by the Minister, this gender equality indicator seeks information on the existence of a SBH policy and/or strategy and whether training of managers on SBH is in place.
16. Do you have a formal policy and/or formal strategy on sex-based harassment and discrimination prevention?

- Yes (select all applicable answers)
  - Policy
  - Strategy
- No (you may specify why no formal policy or formal strategy is in place)
  - Currently under development, please enter date this is due to be completed
  - Insufficient resources/expertise
  - Included in award/industrial or workplace agreement
  - Not a priority
  - Other (provide details):

16.1 Do you include a grievance process in any sex-based harassment and discrimination prevention formal policy and/or formal strategy?

- Yes
- No (you may specify why a grievance process is not included)
  - Currently under development, please enter date this is due to be completed
    - 31/03/2021
  - Insufficient resources/expertise
  - Not a priority
  - Other (provide details):

17. Do you provide training for all managers on sex-based harassment and discrimination prevention?

- Yes - please indicate how often this training is provided:
  - At induction
  - At least annually
  - Every one-to-two years
  - Every three years or more
  - Varies across business units
  - Other (provide details):
- No (you may specify why this training is not provided)
  - Currently under development, please enter date this is due to be completed
  - Insufficient resources/expertise
  - Not a priority
  - Other (provide details):

17.1 If your organisation would like to provide additional information relating to gender equality indicator 6, please do so below:

Other

18. If your organisation has introduced any outstanding initiatives that have resulted in improved gender equality in your workplace, please tell us about them.

(As with all questions in this questionnaire, information you provide here will appear in your public report.)

Diversity Committee developed
Gender composition proportions in your workplace

Important notes:
1. Proportions are based on the data contained in your workplace profile and reporting questionnaire.
2. Some proportion calculations will not display until you press Submit at step 6 on the reporting page in the portal. When your CEO signs off the report prior to it being submitted, it is on the basis that the proportions will only reflect the data contained in the report.
3. If any changes are made to your report after it has been submitted, the proportions calculations will be refreshed and reflect the changes after you have pressed Re-submit at step 6 on the reporting page.

Based upon your workplace profile and reporting questionnaire responses:

Gender composition of workforce
1. the gender composition of your workforce overall is 13.7% females and 86.3% males.

Promotions
2. 18.5% of employees awarded promotions were women and 81.5% were men
   i. 25.0% of all manager promotions were awarded to women
   ii. 18.0% of all non-manager promotions were awarded to women.
3. 1.6% of your workforce was part-time and 0.9% of promotions were awarded to part-time employees.

Resignations
4. 20.8% of employees who resigned were women and 79.2% were men
   i. 0.0% of all managers who resigned were women
   ii. 21.7% of all non-managers who resigned were women.
5. 1.6% of your workforce was part-time and 1.0% of resignations were part-time employees.

Employees who ceased employment before returning to work from parental leave
   i. 12.5% of all women who utilised parental leave ceased employment before returning to work
   ii. 0.0% of all men who utilised parental leave ceased employment before returning to work
   iii. N/A - managers who utilised parental leave and ceased employment before returning to work were women
   iv. 100.0% of all non-managers who utilised parental leave and ceased employment before returning to work were women.

CEO sign off confirmation

Name of CEO or equivalent: Ion Hann
Confimation CEO has signed the report: Yes
Date: 31/07/2020