



Code of Business Conduct & Ethics for Troilus Employees & Contractors

June 2024

THE CODE OF CONDUCT AT TROILUS

Troilus is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment.

The principles enshrined in the Troilus Code of Conduct for our workplace include:

- A non-discriminatory environment
- A harassment free workplace
- No tolerance for workplace violence
- No tolerance for substance abuse
- No direct supervision of one family member by another

As an employee of Troilus, you represent the company. Things you say and do during and outside of work hours can be seen as a reflection of the entire company, therefore it is very important that these policies are always kept in mind.

HARASSMENT IS A FORM OF DISCRIMINATION

WHAT IS HARASSMENT?

Unwelcome physical or verbal behaviour intended to offend, humiliate or intimidate someone.

Harassment targeting an individual's age, gender, race, national origin, ethnicity, ancestry, skin colour, religion, mental or physical disability, genetic information, weight, height, marital or veteran status, pregnancy or parenthood, or any other characteristic protected by law is not permitted at Troilus.

It is also not acceptable to make threats, post messages or engage in aggressive conduct directed at your supervisor or co-workers.

EXAMPLES OF HARASSMENT:

Any behaviour that is offensive or unwelcome:

Words, Actions, Using Racial Slurs, Offensive Music or Photos, Belittling, Bullying, Intimidating, Personal Attacks on Social Media, Spreading Rumours, etc.

EXAMPLES OF DISCRIMINATION AND HARASSMENT

VERBAL

- Use of racially derogatory words or phrases
- Negative comments about a person's religious beliefs (or lack of religious beliefs)
- Expressing negative stereotypes regarding a person's birthplace, ancestry or ethnicity
- Negative comments regarding a person's age
- Derogatory or intimidating references to a person's mental or physical capabilities
- Negative comments about a particular gender or about pregnancy or related conditions
- Spreading rumours, gossiping
- Doing any of the above on social media

NON-VERBAL

- Offensive gestures or motions
- Displaying or distributing offensive pictures, drawings, social media posts or e-mails
- Glaring or staring at someone
- Mimicking someone with a disability
- Ignoring someone or being cold/distant to them

PHYSICAL

- Physical assault against another person
- Blocking a person's path
- Cornering a person
- Inappropriate touching/bumping into a person
- Destruction or defacing of another's personal property

WHAT TO DO IF YOU EXPERIENCE OR NOTICE UNFAIR TREATMENT

ZERO TOLERANCE

Troilus is committed to a workplace free from any type of harassment or discrimination.

WHAT TO DO

If you see or experience harassment or discrimination:

- If possible, advise the person making you uncomfortable that their behavior is unwelcome
- Discuss your concerns with your direct supervisor. If you feel you cannot talk to your direct supervisor, bring your concerns to the Camp Managers (Yannick or Marc), VP Quebec Operations (Jacqueline) or the Office Manager (Juanita)
- Concerns can also be shared anonymously if you are not comfortable discussing in person
- Do not assume that someone knows this is happening or that it will go away
- Under the Troilus Code of Conduct, employees or contractors will not be subject to any retribution/retaliation for sharing concerns

EFFECTS OF DISCRIMINATION & HARASSMENT

Individual Impacts: Being the target of discrimination or harassment can have a profound impact on an individual's mental and physical wellbeing including stress, anxiety, loss of confidence, depression, loss of sleep, weight loss, damage to reputation, etc.

Erosion of Troilus' image: As an employee of Troilus, you represent the company. If a Troilus employee acts inappropriately, it can reflect badly on the entire Company – both in the workplace and in the community

Lowered workplace morale: A hostile workplace can reduce efficiency & productivity, increase absenteeism and staff turnover, deter people from applying for jobs at Troilus.

We all contribute to making Troilus a desirable place to work and a good corporate neighbour in the community. We are all accountable.

TROILUS POLICY ON DRUGS & ALCOHOL

- Troilus is a dry camp – all employees and contractors are required to perform their job responsibilities in a professional manner, free from the effects of drugs or alcohol
- Using drugs or alcohol while on the job can impact productivity and put the health & safety of a worker and colleagues at risk
- Troilus has zero tolerance for the use of drugs and alcohol at site or performing work duties while under the influence of drugs or alcohol
 - This includes consuming alcohol within 8 hours of the start of a work shift or drugs within 32 hours of the start of a work shift
- If your license is suspended due to drug or alcohol use and you operate Troilus vehicles in the course of your job, you must notify your supervisor of the suspension
- If you are taking a prescription or over-the-counter medication which may impact your job you must notify the nurse or your supervisor
- If you are approved to use cannabis for medical purposes, you must notify the nurse or your supervisor and provide supporting documents
- If you become aware that a co-worker is engaged in work while under the influence of drugs or alcohol, you must notify a supervisor
- Employees or contractors may be subject to random screening and search of locker/personal belongings
- Contravention of the policy will result in immediate dismissal

MANDATORY DISCLOSURE OF AN ADDICTION PROBLEM

Troilus places great importance on promoting and maintaining the health and well-being of its Employees, specifically with respect to the use of Drugs or Alcohol.

The Policy also intends to provide support to Employees suffering from addiction problems to allow them to continue working in a safe manner that does not put themselves or their colleagues at risk.

Any Employee with a substance abuse or dependency problem must disclose such a problem to the Employer **before acting in violation of the Policy.**

An Employee who makes such a declaration will receive the necessary assistance and support from Troilus without any fear of reprisal. Such assistance and support are reserved to employees hired by Troilus, to the exclusion of employees of Troilus' contractors, subcontractors and suppliers.

Any Employee with an addiction problem who fails to disclose it to Troilus prior to the occurrence of an incident **will be bound by the zero-tolerance policy and subject to immediate dismissal**

If you need advice, or if you know of or suspect any violations of the Policy, you should contact your immediate supervisor or a nurse at: clinique@troilusgold.com or to Jacqueline Leroux, VP Environment, Permitting & Quebec Operations at Jacqueline.Leroux@troilusgold.com

YOUR RESPONSIBILITY AS A TROILUS EMPLOYEE

- Understand Troilus' anti-harassment/anti-discrimination policies and procedures
- Refrain from participation in, or encouragement of actions that could be perceived as harassment
- Refrain from posting on social media about your fellow employees, your supervisors or the Company. If you have grievances or concerns you wish to have addressed, you must use the appropriate internal channels. It is **never** acceptable to post negative and/or confidential information regarding Troilus and/or its employees and service providers on social media
- Report any acts that you think are harassment to your supervisor (whether the actions are directed towards you or another employee)
- Encourage any employee who confides in you that they are feeling harassed or discriminated against to immediately report these acts to a supervisor
- Refrain from using any drugs or alcohol while you are on your shift and let a supervisor or the nurse know if you think someone you work with is under the influence

CONSEQUENCES: Engaging in behaviour contrary to the Code of Conduct may result in a warning, suspension from work or dismissal.



THANK YOU