



## **SAFETY, ENVIRONMENTAL, AND COMMUNITY STEWARDSHIP POLICY**

### **Scope of the Safety, Environmental, and Community Stewardship Policy**

The Company executes our business practices with commitment to safety, environmental, and community stewardship through the development of a sustainable approach to Corporate Social Responsibility. We all are accountable for promoting leading practices in safety, environmental protection and community relations and for communicating our safety, environmental, and community expectations to employees, contractors, local communities, regulators, the general public and other stakeholders. We will strive to create a workplace where every one of our employees commits to a culture of safety, environmental protection, sustainable resource development and sustainable community engagement. In the jurisdictions in which we operate, we will diligently apply appropriate methodologies to protect the environment and communities over the full life cycle of mining, including throughout our exploration, development, mining, processing and closure activities.

Our safety and environmental obligations include, but are not limited to, promoting a culture of “zero harm” to our personnel, contractors, the environment, and host communities (the public) in which we operate, striving for continuous improvement in our safety and environmental performance, and obtaining permits and approvals and maintaining compliance with all applicable laws and regulations in the countries in which we operate. We are committed to fulfilling each of these obligations in an effective and responsible manner.

In advancing each of our safety, environmental, and community values, standards and commitments, we will:

- Comply with all applicable safety and environmental laws, rules and regulations, and all applicable regional and site rules and regulations in the countries in which we operate
- Develop, implement and evaluate our safety, environmental, and community development programs and management systems with a view to continually improving our environmental and community performance
- Develop, design and operate our facilities based upon the efficient use of energy, resources and materials, encouraging biodiversity, and maximizing host community benefits
- Identify, assess, and manage material safety, environmental, and community risks with a goal to minimize harm to our employees, contractors, the environment, and our communities
- Develop a system to allow our employees, contractors, communities to bring forward concerns related to all phases of our operations, commit to meaningful consultation and build respectful relationships with such stakeholder groups and communities, including indigenous peoples and their governments and other representatives

- Encourage dialogue on safety, Environmental, and community issues, and respond to employee, public, and other stakeholders' inquiries in an open, timely, forthright and sincere manner
- Develop appropriate community engagement and development systems to prioritize support for sustainable development, including equitable access to jobs, training and education opportunities
- Recognize the important role and responsibility we have in respecting the human rights of our stakeholders and align this commitment with the "Protect, Respect, Remedy" framework of the United Nations Guiding Principles on Business and Human Rights
- Conduct human rights reviews and assessments at our operations to augment our existing management of human rights

This policy applies to all directors, officers, employees and work partners of the Company, our subsidiaries, affiliates and joint ventures, wherever located.

### **Procedure for Reporting Concerns (Employees or Contractors)**

Employees or contractors should first try to address issues with their supervisor or the President and CEO of the Company. If employees feel their concerns are not being addressed or they wish to remain anonymous, employees should contact the Compensation & Corporate Governance Committee and describe their concern in writing. They should include sufficient information to allow the Compensation & Corporate Governance Committee to understand and review their concern. If employees wish to remain anonymous, their written communication should clearly indicate this wish for anonymity. All concerns should be forwarded to the Chairperson of the Compensation & Corporate Governance Committee in a sealed envelope labelled as follows:

Emgold Mining Corporation  
 Attention: Chair of Compensation & Corporate Governance Committee (Confidential)  
 789 West Pender Street, Suite 1010,  
 Vancouver, B.C. V6C 1H2

Alternatively, emails can be sent to [info@emgold.com](mailto:info@emgold.com) with the subject line: Please forward to Chair of Compensation & Corporate Governance Committee (Confidential).

If employees wish to discuss any matter with the Compensation & Corporate Governance Committee, they should indicate this in their submission. In order to facilitate such a discussion, employees may include a telephone number and/or email address at which they can be contacted. Any such envelopes or emails received by the Company will be forwarded promptly and unopened to the Chairperson of the Compensation & Corporate Governance Committee.

### **Procedure for Reporting Concerns (Other Stakeholders)**

Other stakeholders should first try to address issues with the Company Representative in charge of the specific project or work. The next step would be to contact the President and CEO of the Company. If stakeholders feel their concerns are not being addressed or they wish to remain anonymous, they should contact the Compensation & Corporate Governance Committee and describe their concern in writing. They should include sufficient information to allow the Compensation & Corporate Governance Committee to understand and review their concern. If stakeholders wish to remain anonymous, their written communication should clearly indicate

this wish for anonymity. All concerns should be forwarded to the Chairperson of the Compensation & Corporate Governance Committee in a sealed envelope labelled as follows:

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### **Handling of Concerns Raised to the Compensation & Corporate Governance Committee**

Promptly following the receipt of any complaints submitted to it, the Compensation & Corporate Governance Committee will investigate each complaint and take appropriate corrective actions.

### **Investigations**

The Compensation & Corporate Governance Committee has the authority to:

- (a) conduct any investigation which it considers appropriate, and has direct access to the external consultants of the Company, as well as officers and employees of the Company; and
- (b) retain, at the Company's expense, special legal, accounting or such other advisors, consultants or experts it deems necessary in the performance of its duties.

In conducting any investigation, the Compensation & Corporate Governance Committee shall use reasonable efforts to protect employees' anonymity.

### **Records**

The Compensation & Corporate Governance Committee will retain as part of its records, any complaints or concerns for a period of no less than **seven years**. The Compensation & Corporate Governance Committee will keep a written record of all such reports or inquiries and make quarterly reports on any ongoing investigation which will include steps taken to satisfactorily address each complaint.

### **Employee Protection**

All employees are assured that no retaliation of any kind is permitted against them for complaints or concerns made in good faith. No employee will be adversely affected because the employee refuses to carry out a directive which, in fact, constitutes corporate fraud, or is a violation of federal or provincial law.

**Questions about this Policy**

If you have any questions, contact the Chairperson of the Compensation & Corporate Governance Committee.

*This policy was adopted and approved by the Board as of October 26, 2021.*