

## Hemlo Open Reporting Platform

Our Code of Business Conduct and Ethics and Whistleblower Protection and Investigation Policy are essential components of how Hemlo Mining Corp. upholds high standards of integrity, ethics, accountability, fairness, and professionalism.

Hemlo has also launched a confidential incident reporting channel, called “Hemlo Open Reporting”, to allow employees, contractors, suppliers, shareholders or other stakeholders to communicate any concerns confidentially and anonymously, with the expectation of a timely response and the assurance that there will be no retribution or negative consequences to the reporting party.

Hemlo Open Reporting is an online platform is administered by an independent third-party, called Vault Platform, and is accessible online at the link below:

<https://app.vaultplatform.com/hemlomining/open-reporting>.

All reports are treated on a confidential basis. Generally, a report will only be disclosed to the people who need to know in order to carry out a proper investigation. No retaliation or other action will be taken against any Hemlo employee who, in good faith, reports a complaint. Any Hemlo employee engaging in retaliatory conduct will be subject to disciplinary action by Hemlo, which may include termination.

Each quarter, a report is submitted to the Audit Committee outlining the number of complaints received since the previous report; all complaints received, by relevant category, since the previous report, and the reporting avenues used.

The FAQs below offers additional information and guidance regarding the Hemlo Open Reporting platform:

## FAQs

### **What is the Hemlo Open Reporting platform?**

The Hemlo Open Reporting platform provides a confidential way to report and resolve issues at work. It is administered by an independent third party, called Vault Platform. It has been implemented at the Company to help employees speak up and feel safe.

### **Can I submit a report anonymously?**

Yes. Our goal is to ensure your comfort in reporting any form of misconduct. While reports can always be made directly to your manager or HR representative, at times, you may prefer to submit a written report through the Hemlo Open Reporting platform. It can then be dealt with directly by a case team reporting directly to the Company’s Audit Committee. You can submit a

report confidentially and anonymously or using your name and email – however you are most comfortable.

### **Who sees my reports?**

When you submit a report, a case manager will be assigned to review and investigate your report. They will be able to message you directly via the Hemlo Open Reporting channel, even if you choose to remain anonymous, so they can ask you questions and keep you updated.

### **Will I be notified if I receive a message from my Case Manager?**

No, you will not be notified if a message is waiting for you. You will need to log in to the Hemlo Open Reporting platform to collect your messages.

### **We have an open-door policy and face-to-face conversations; Why do we need a tool like this?**

We are not seeking to replace face-to-face conversations. Employees are free to report any concerns or questions directly to their manager or HR representative. You may also report matters by mail or email to the Chair of the Audit Committee or the General Counsel, at the corporate office address or [legalnotices@hemlomining.com](mailto:legalnotices@hemlomining.com). The Hemlo Open Reporting platform provides an additional tool that helps extend employees' ability to speak up, be heard, and very importantly, do so in a way that feels safe. We know that victims are often afraid to come forward directly. Hemlo Open Reporting gives people a secure channel to report any incidents they experience, and also the ability to decide when and how to submit a report.

### **What if I witnessed something but wasn't directly affected, can I still submit a report?**

Yes, we encourage you to submit anything via the reporting channel that made you feel uncomfortable or unsafe, whether you were a victim or a witness.

### **How does Vault Platform secure my data?**

Vault uses multiple security measures to ensure the safety of your data. Any data you enter into the Vault Platform is fully secured using Advanced Encryption Standard (AES-256) and a uniquely generated encryption key. Until your report is submitted, no one (not even Vault) can access any data. Once your report is submitted, only the assigned case team can access the data.