

# Harassment Prevention Policy

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## 1 INTRODUCTION AND OBJECTIVE OF THE POLICY

Thor Explorations Ltd (Thor) together with its subsidiary companies, referred to as the "Corporation", has determined that the Corporation is committed to maintaining a work environment that demands respect for the dignity of each individual regardless of age, race, religion, gender, sexual orientation, handicap, or national or ethnic origin. Harassment of any nature is considered unacceptable and will not be tolerated.

This Harassment Prevention Policy (the "**Policy**") has been adopted for, and is intended to act for, the benefit of our stakeholders. We consider stakeholders to mean our employees, contractors and the local communities and individuals who live in proximity to our operations.

Stakeholders are expected to treat each other with courtesy and respect. They should at all times avoid behaviour at the workplace that may create an atmosphere of hostility or intimidation. This applies to all interactions, whether with supervisors, peers or subordinates; and in all work situations, including business travel.

## 2 DEFINITION OF HARASSMENT

### 2.1 General Harassment

Harassment is unwelcome verbal or physical behaviour that unreasonably interferes with work or creates an intimidating, hostile or offensive work environment. It can occur regardless of age, race, religion, gender, sexual orientation, handicap, or national or ethnic origin of the perpetrator, and can include but is not limited to:

- comments (oral, written), gestures, or physical actions;
- single incidents or repeated, continuous patterns of behaviour;
- bullying or hostile behaviour through any medium;
- behaviour that demeans, belittles or causes personal humiliation or embarrassment;
- behaviour that is directed at a particular person or a number of people;
- behaviour that is initiated by a colleague, a supervisor or someone outside the Corporation;
- incidents that take place at work or during social functions related to the workplace; or
- bias when a group of people is singled out for negative attention.

Behaviours that might constitute harassment include but are not limited to:

- public or private tirades by a supervisor or colleague;
- severe or repeated insults related to a person's personal or professional competence;
- threatening or insulting comments, whether oral or written, including those made through all types of electronic media;

- deliberate desecration of religious and/or national symbols;
- racial epithets, slurs, and malicious, negative stereotyping expressed toward an individual or a group directly or indirectly (e.g., circulated via e-mail, written on walls); or
- malicious and false complaints of misconduct against other employees.

Notwithstanding the above, a distinction must be drawn between harassment and the legitimate exercise of, e.g., a management authority in relation to a *bona fide* concern about performance or another aspect of an individual's work. The key differentiation is the proportionality of criticism or disciplinary action judged necessary by the manager in question and whether the same is reasonable in the circumstances.

## 2.2 Sexual harassment

Sexual harassment is any unwelcome conduct of a sexual nature, which makes a person feel offended, humiliated and/or intimidated. Sexual harassment can take various forms and can occur regardless of gender or sexual orientation of the perpetrator. It can involve conduct such as:

- suggestive comments or jokes;
- insults or taunts of a sexual nature;
- inappropriate advances in person or on social networking sites; or
- sexually explicit pictures, posters, screen savers, emails, tweets, social networking posts, SMS/texts.

It also can involve intrusive contact or conduct of a suggestive nature via phone, text, email, social media, or in person outside of working hours, including but not limited to:

- unwelcome touching, hugging or kissing;
- staring or leering;
- unwanted invitations for sex or persistent requests to go out on dates;
- intimidating behaviour with a sexual overtone by a person in a position of direct or indirect authority over another;
- intrusive questions about another person's private life or body;
- unnecessary familiarity, such as deliberately and repeatedly brushing up against someone;
- accessing sexually explicit internet sites using work PCs or laptops;
- coerce a person into a sexual action by any means (including inequality of wealth or power); or
- behaviour that would also be an offense under criminal law, such as physical assault, indecent exposure, sexual assault, stalking or obscene communication.

## **3 MANAGEMENT'S RESPONSIBILITY**

The Corporation aims to foster a productive workplace free from harassment and discrimination, in which the dignity of each individual is fully respected. Managers and supervisors have the responsibility to monitor their work environment and must take all necessary action to prevent and stop harassing behaviour. Managers shall make themselves available to employee who may wish to raise concerns in confidence and shall deal with such concerns in an impartial and sensitive manner.

Managers have a particular responsibility to set positive examples. In their daily actions and communications with staff, they must make clear that harassing behaviours will not be tolerated.

## **4 REPORTING ALLEGED HARRESSMENT OR COMPLAINTS**

The Corporation encourages reporting of all incidents of harassment, regardless of who the offender may be, or the position held in in the Corporation. Stakeholders who believe that they or someone else may be experiencing harassment should in the first instance contact the appropriate supervisor or the Human Resources Department. If a stakeholder does not feel comfortable approaching his/her supervisor or the Human Resources Department with a complaint of harassment, for example, because the supervisor is the

alleged harasser or is related to or has a familial/community connection to the alleged harasser, the employee should report the harassment as per Thor's Whistle Blower Policy. The Thor whistleblowing hotline exists to allow issues to be lodged confidentially or by email. Persons wishing to make complaints or report concerns on a confidential basis are encouraged to use the following toll free numbers: +44-800-092-3586 (UK) or +234 1 227 9228 (Nigeria). Complaints may also be submitted via e-mail: [thorexpl@integritycounts.ca](mailto:thorexpl@integritycounts.ca) or through Thor's dedicated web portal: <https://www.integritycounts.ca/org/thorexpl>. Anonymous grievance submission boxes are also available at each mine site to facilitate the reporting of any concerns.

#### 4.1 No Adverse Consequences

The reporting of any alleged harassment will not have any impact on a stakeholder's current job or on any future job or promotion prospects with the Corporation and he or she will be protected against any retaliation by the alleged harasser or any other representative of the Corporation.

The Corporation will take all appropriate measures to minimize the risk of any victimization or reprisals against the complainant or the alleged harasser. It shall ensure that all staff, including management and supervisory staff, are informed that the Corporation will not tolerate victimization or reprisals. If management becomes aware of victimization or reprisal or threats of such in the workplace as a result of a complaint lodged, appropriate support services shall be made available to the complainant. Disciplinary action shall be taken in accordance with the Corporation's usual procedures for breach of a Corporation policy. This may include dismissal. Applicable laws may also play a role in determining the outcome of a harassment allegation.

#### 4.2 False Accusations

The Corporation recognizes that false accusations of harassment can have serious effects on innocent persons. If, after the investigation, it is found that the complainant has maliciously or recklessly made a false accusation, the complainant will be subject to appropriate sanctions. A false accusation found to have been made with malice or reckless disregard for the truth will be treated with the same degree of seriousness and severity as an allegation of harassment itself.

### **5 DETERMINE IF HARRASSMENT HAS OCCURRED**

Any complaint brought to the attention of the Corporation will be promptly investigated in a confidential manner so as to protect the privacy of persons involved. Upon completing the investigation of a harassment complaint, the Corporation will communicate its findings and intended actions to the complainant and alleged harasser. The Corporation is not bound to act in the absence of sufficient compelling evidence corroborating an accusation.

In situations where the determination is that harassment has occurred, then depending on the severity of the incident, whether relevant behaviour was persistent and deliberate, and the presence of any other aggravating factors, the appropriate outcome may be focused on getting the harasser to cease the harassing behaviour and providing support to the complainant. Disciplinary measures deemed appropriate given the severity of the harassing behaviour may include referral to counselling or training, withholding of a promotion, reassignment, temporary suspension without pay, financial penalties, probation, termination, or others.

### **6. AMENDMENT, MODIFICATION AND WAIVER**

The Board of Directors of the Corporation will review and evaluate this Policy on receipt of recommendations from the Audit Committee and/or annually to determine its efficacy.

## **7. PUBLICATION OF THE POLICY ON WEBSITE**

This Policy will be posted on the Corporations website at [www. https://thorexpl.com/corporate/board-committees-and-policies/](https://thorexpl.com/corporate/board-committees-and-policies/).

Last Updated: 31 August 2022

Approved by: Board of Directors