

MAKO MINING CORP.
(the “Company”)

WORKPLACE BULLYING AND HARASSMENT POLICY
(the “Policy”)

PURPOSE

The Company is committed to a work environment that is free of bullying and harassment, and one in which all individuals are treated with respect and dignity. This Policy has been established to provide clear statement on:

- (a) what does and what does not constitute bullying and harassment;
- (b) roles and responsibilities of the Company, its supervisors and employees,
- (c) the process for reporting bullying and harassment; and
- (d) the process for responding to and investigating reports of bullying and harassment.

SCOPE

This policy applies to all Company employees including permanent, temporary or casual employees as well as independent contractors. Where the term “employee” is used in this Policy, it will also be deemed to include independent contractors. This Policy applies wherever the Company’s business or work-related activities are conducted (including washrooms and lunchrooms), and includes work-related social functions, conferences and training, and work assignments outside of Company premises (collectively referred to as the “**Workplace**”). This Policy also applies to conduct by employees outside of the Workplace when one or more of Company employees are the target of bullying and harassment (i.e. cyber-bullying).

POLICY STATEMENT

Every employee has the right to a Workplace that is free from harassment in any form. Bullying and harassment is unacceptable and will not be tolerated. The Company will make every reasonable effort to prevent and eliminate bullying and harassment in the Workplace, and to deal fairly and appropriately with any complaints it receives.

Employees must:

- (a) not engage in the bullying and harassment of other employees;

(b) report if bullying and harassment is observed or experienced; and

(c) comply with the Company's policies and procedures on bullying and harassment.

Any employee or independent contractor who engages in workplace bullying and harassment will be subject to discipline, up to and including termination of employment or contract.

BULLYING AND HARASSMENT

WorkSafe BC defines Bullying and Harassment as including:

(a) any inappropriate conduct or comment by a person towards a worker that the person knew or reasonably ought to have known would cause that worker to be humiliated or intimidated, but

(b) excluding any reasonable action taken by an employer or supervisor relating to the management and direction of workers or the place of employment.

Workplace bullying and harassment include acts, physical contact or comments which can have the effect of mentally hurting or isolating a person in the Workplace. Workplace bullying and harassment usually consists of repeated incidents or a pattern of behaviour that is intended to intimidate, offend, belittle or humiliate a particular person or group of people. Lack of intent does not mean the conduct is not bullying and harassment if the bully ought to have known the behaviour would cause the victim to be humiliated or intimidated. Bullying and harassment can also consist of a single traumatic incident.

Workplace bullying and harassment does not include the exercise of management rights to reorganize the Workplace, assign additional work, to hold employees accountable for their performance through performance improvement or corrective action plans, and impose justifiable discipline. Also, not every instance of Workplace conflict or differences of opinion is bullying and harassment, nor is making a legitimate complaint about another's conduct through the Company's established procedures.

BULLYING AND HARASSMENT REPORTING PROCEDURE

WHAT TO DO IF YOU OBSERVE, OR BELIEVE YOU ARE THE VICTIM OF BULLYING AND HARASSMENT

Employees who feel they are being subject to bullying and harassment are encouraged to tell the individuals that his/her behaviour is unwelcome and ask him/her to stop. It is difficult or inappropriate to approach the person responsible, or if the offender does not stop the behaviour, then employees should report the incident(s).

Employees who become aware of situations where bullying and harassment may be occurring should report to suspected bullying and harassment.

HOW TO REPORT ALLEGED AND SUSPECTED BULLYING AND HARASSMENT

Reports of alleged or suspected bullying and harassment may be made verbally or in writing. Provide as much information as possible in the report, including an account of the incident(s), where and when the incident(s) occurred, the persons involved and the names of witnesses, if any. Provide any other evidence or information that you may believe are relevant to the complaint, such as emails, handwritten notes, text messages and photographs.

Reports should be made to the employee's immediate supervisor or manager. If the immediate supervisor or manager is alleged to be involved in the bullying and harassment, then reports can be made to the Chief Executive Officer.

CONFIDENTIALITY

All reports complaints will be handled in a confidential manner. Information concerning a complaint, or action taken as a result of the investigation, will only be released as necessary to conduct a proper investigation, to take disciplinary measures, or where required by law.

BULLYING AND HARASSMENT INVESTIGATION PROCEDURE

HOW AND WHEN INVESTIGATIONS WILL BE CONDUCTED

All complaints and reports of alleged bullying and harassment will be investigated. Most investigations will be conducted internally, however in complex or sensitive situations, and external investigator may be hired. The investigation process will involve interviews of the complainant, the respondent and any witnesses named by either. If the complainant and the respondent agree on what happened in the incident, the Company will not investigate further and will determine what corrective action to take.

Investigations will be:

- Undertaken promptly and diligently;
- Focused on finding facts and evidence, including interviews of the complainant, respondent and any witnesses;
- Sensitive to the interests of all parties involved; and
- Fair and impartial.

ROLES AND RESPONSIBILITIES

All employees are expected to report suspected bullying and harassment and to cooperate with those responsible for investigating any complaints. The Company has a responsibility to prevent any bullying and harassment in the Workplace therefore if any supervisor or manager fails to report incidents of bullying and harassment, or fails to take appropriate corrective action, he or she will be subjected to disciplinary action, up to and including termination.

FOLLOW-UP

The Complainant and respondent will be advised of the result of the investigation results, and appropriate correction actions, including discipline will taken at that time. The Company will keep a written record of investigations, including the findings.

Regardless of the outcome of any bullying and harassment complaint made in good faith, the employee lodging a complaint or reporting suspected bullying and harassment, as well as anyone providing information regarding the complaint, will be protected from any form of retaliation by either co-workers or supervisors.

PERIODIC REVIEW

The Company's Workplace Bullying and Harassment Policy will be reviewed periodically, as deemed necessary. All employees will be provided with a copy of the Policy when they are hired and when amendments to the Policy are made.

Approved by the Board on July 13, 2020.