



WINSHEAR METALS CORPORATION
(the “Company” or “Winshear”)

WORKPLACE RELATIONS POLICY

*Adopted by the Board of Directors of
Winshear Metals Corporation
on February 26, 2021*

PURPOSE

Winshear is committed to providing a safe and healthy work environment that provides a foundation for sustained positive and effective workplace relations. The accompanying Health and Safety Policy focuses on this foundation. This Workplace Relations Policy focuses on the workplace relations themselves.

PRINCIPLES

Winshear considers workplace harassment and bullying to be unacceptable forms of behaviour, which will not be tolerated under any circumstances. Winshear believes that all employees have the right to work in an environment free of intimidation, threat and humiliation. Workplace harassment and bullying in any form is harmful to co-workers.

The Company is committed to:

- Equal employment opportunity;
- Fair treatment and non-discrimination for all existing and future employees and workers;
- A workplace free of harassment and bullying.

Workplace Discrimination and Harassment

A person is subject to workplace discrimination or harassment if that person is subjected to behaviour by another person, including the person's supervisor or a co-worker or group of co-workers, that:

- Is unwelcome and unsolicited;
- The person considers to be offensive, intimidating, humiliating or threatening; or
- A reasonable person would consider offensive, humiliating or threatening.

It is unacceptable to discriminate based on the following grounds (the “Prohibited Grounds”):

- Age,
- Race,
- Colour,
- Nationality,
- Ethnicity,
- Disability,
- Religious belief or activity,
- Political opinion or activity,
- Trade union membership or activity,
- Gender identity or expression,
- Marital status,
- Pregnancy,
- Parental Status,
- Breastfeeding.
- Lawful sexual activity/ preference,
- Gender identity,
- Sexual orientation,
- Genetic characteristics,
- Family status,
- Conviction for an offence for which a pardon has been granted or in respect of which a record suspension has been ordered,
- Association with, or relation to, a person identified on the basis of any of the above,
- Instructions to discriminate or harass a person.

Workplace harassment or discrimination does not include reasonable management action taken in a reasonable way by the person's employer in connection with the person's employment or performance. Workplace harassment or discrimination usually consists of a pattern of unwelcome behaviour. There is no requirement that the harasser intends to offend or harm in order for it to be unlawful. Harassment or discrimination in a given situation is regulated and defined by applicable laws and legal practices.

Winshear's obligations toward all employees cover harassment by third parties such as clients, customers, suppliers, other organizations and members of the public, towards an employee, while the employee is conducting Winshear business on or off Company premise. It is recognized that workplace harassment may involve comments and behaviours that offend some people and not others, and individuals may react differently to comments and behaviour.

Sexual Harassment

Sexual harassment is illegal and all Winshear personnel are prohibited from engaging in any form of sexually harassing behavior. Sexual harassment means unwelcome sexual conduct, either visual, verbal or physical, and may include, but is not limited to, unwanted sexual advances, unwanted touching and suggestive touching, language of a sexual nature, telling sexual jokes, innuendoes, suggestions, suggestive looks and displaying sexually suggestive visual materials.

Sexual harassment is defined as any unwelcome behaviour of a sexual nature, which is deemed offensive, humiliating or intimidating *by the affected person*. The behaviour must be of a sexual nature, must be unwanted and must be what a reasonable person would recognize as being unwelcome and likely to cause the person to feel offended, humiliated or intimidated. The unwelcome behaviour may be (but need not be) repeated or continuous – a single incident can amount to sexual harassment.

Workplace Bullying

Workplace bullying is the "repeated, less favourable treatment of a person by another or others in the workplace, which may be considered unreasonable and inappropriate workplace practice." It includes behaviour that intimidates, offends, degrades or humiliates a worker, possibly in front of co-workers, clients or customers. Bullying behaviours can range from subtle intimidation to more obvious aggressive tactics. Workplace bullying may include:

- Verbal abuse and yelling, may include yelling, swearing, or intimidating behaviour;
- Isolating employees from normal work interaction, training etc.;
- Tampering with an employee's personal effects or work equipment;
- Teasing or regularly making someone the brunt of pranks or practical jokes;
- Repeated threats of dismissal or other severe punishment for no reason;
- Constant ridicule and being put down;
- Leaving offensive messages on email or the telephone;
- Sabotaging a person's work, for example, by deliberately withholding or supplying incorrect information, hiding documents or equipment, not passing on messages and getting a person into trouble in other ways;
- Persistent and unjustified criticism, often about petty, irrelevant or insignificant matters;
- Humiliating a person through gestures, sarcasm, criticisms and insults, often in front of customers, management or other workers; and
- Spreading gossip or false, malicious rumours about a person with an intent to cause the person harm, or with the effect of causing such harm.

A Nondiscriminatory Environment

Winshear fosters a work environment in which all individuals are treated with respect and dignity. The Company is an equal opportunity employer and does not discriminate against actual or potential employees, officers, directors, suppliers, customers or shareholders on the basis of the Prohibited Grounds, or on any other category protected by Canadian

federal and provincial laws, rules and regulations and, in addition, in accordance with the laws, rules or regulations applicable in the jurisdictions where such individuals are located. The Company is committed to actions and policies to ensure fair employment, including equal treatment in hiring, promotion, training, compensation, termination and corrective action. Winshear will not tolerate discrimination by any of its Personnel.

Substance Abuse

Winshear is committed to maintaining a safe and healthy work environment free from the harms of substance use and abuse. Personnel are expected to perform their responsibilities in a professional manner and, to the degree that job performance or judgment may be hindered, free from the effects of drugs and/or alcohol. This is especially important for safety-sensitive positions, such as machine-operators.

Workplace Violence

The workplace must be free from violent behavior. Threatening, intimidating or aggressive behavior, as well as bullying, subjecting to ridicule or other similar behavior toward fellow employees or others in the workplace will not be tolerated and is cause for dismissal.

Employment of Family Members

Employment of more than one family member at a Winshear office or other premises is permissible but the direct supervision of one family member by another is not permitted unless otherwise authorized by the Chair of the Audit Committee. Indirect supervision of a family member by another is also discouraged and requires the prior approval of the Chair of the Audit Committee.

If allowed, any personnel actions affecting that employee must also be reviewed and endorsed by the CEO and if needed the Chair of the Audit Committee.

REPORTING

An employee who is being harassed or bullied, or who witnesses harassment or bullying, should contact their immediate supervisor, the operations manager, or the General Manager in the first instance for the management and resolution of a workplace harassment, discrimination or bullying complaint. If the initial reporting does not resolve the issue, the employee can use the Whistleblower process, described in the accompanying Whistleblower policy, to escalate the report.

NON-COMPLIANCE

Disciplinary action will be taken against anyone who is found to have discriminated against, harassed or bullied a co-worker or client. Discipline may involve a warning, counselling, demotion or dismissal depending on the circumstances. Those in authority who knowingly tolerate such behaviour are also guilty of misconduct and could be held

liable for any case of harassment occurring in the Company. It is the responsibility of executive management, managers, supervisors and employees, to ensure that individuals are not subjected to discrimination, harassment or bullying by providing ongoing guidance to all employees on this Policy, as per the guidelines laid out above.

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