



## ISSUE RESOLUTION (WHISTLEBLOWER) POLICY

### 1. PURPOSE

Pursuant to its charter, the audit committee (the "Audit Committee") of the board of directors of Wesdome Gold Mines Ltd. ("Wesdome" or the "Company") and management ("Management") are responsible for ensuring that a confidential and anonymous process exists whereby all directors, officers, employees and consultants of Wesdome (collectively "employee" or "employees") can report any complaints or expressions of concern with respect to the Company's internal controls and legal and regulatory compliance. In order to carry out its responsibilities under its charter, the Audit Committee has adopted this Issue Resolution Policy (the "Policy").

### 2. APPLICATION

This Policy is applicable to all directors, officers, employees, consultants and contractors of the Company.

### 3. RESPONSIBILITIES OF AUDIT COMMITTEE REGARDING SPECIFIED COMPLAINTS

The Audit Committee shall receive, investigate and act on complaints and expressions of concern ("Complaints") by employees regarding:

- accounting, internal accounting controls and auditing matters, including those regarding the circumvention or attempted circumvention of internal accounting controls or that would otherwise constitute a violation of the Company's accounting policies (an "Accounting Concern");
- compliance with legal and regulatory requirements and any matter, which, in the view of the complainant, is illegal, unethical, contrary to the policies of the Company or in some other manner not right or proper;
- retaliation against any employees who make a Complaint.

Responsibilities of the Audit Committee created by these procedures may, at the discretion of the Audit Committee, be delegated to any member of the Audit Committee.

Examples include:

- violation of any applicable law, rule, or regulation that relates to corporate reporting and disclosure;
- violation of any corporate policies, including health, safety, environmental, operational, or ethical;
- fraud or deliberate error in the preparation, evaluation, review, or audit of any financial statement of the Company or any of its subsidiaries;
- fraud or deliberate error in the recording and maintaining of financial or other records of Company or any of its subsidiaries;
- deficiencies in or noncompliance with the Company's internal policies and controls;
- misrepresentation or a false statement by or to any employees of the Company respecting a matter contained in the financial records, reports, or audit reports;
- deviation from full and fair reporting of the Company's consolidated financial condition.

#### **4. REPORTING ALLEGED VIOLATIONS AND COMPLAINTS**

Any person with a Complaint relating to the Company may submit his/her concern to the Chair of the Audit Committee in writing or by email as follows:

Chair of the Audit Committee, in confidence  
Wesdome Gold Mines Ltd.  
220 Bay Street, Suite 1200 Toronto, ON M5J 2W4  
[issueresolution@wesdome.com](mailto:issueresolution@wesdome.com)

The Company also provides an anonymous and confidential 24-hour reporting hotline (the “Whistleblower Hotline”), available by telephone and internet, to facilitate receipt of Complaints from employees. Information on the use of the Whistleblower Hotline will be made available to all employees upon joining the Company, and is available in the Company’s Code of Conduct and Ethics, on the Company website and through signage in and around common areas on Company property. Sensitive workplace issues can be reported by telephone at 1.800.661.9675 or through the internet at [www.wesdome.confidenceline.net](http://www.wesdome.confidenceline.net).

#### **5. INVESTIGATIONS**

Upon receiving a Complaint, the Chair of the Audit Committee will promptly conduct a thorough investigation, which may be undertaken with the assistance of the Chair of the Governance & Nominating Committee of the Board, and the Chair of the Audit Committee will notify the Board of Directors of such investigations. The Chair of the Audit Committee may, in his or her discretion, delegate some or all of the investigation to the President & Chief Executive Officer and/or other senior Management, as deemed appropriate and necessary, and refer investigations to outside third parties or other committees of the Board where in his or her discretion, the matters to be investigated fall outside of the expertise of the Audit Committee.

It is the obligation of all employees to cooperate in such investigations. Those responsible for the investigation will maintain the confidentiality of the allegations of the Complaint and the identity of the persons involved, subject to the need to conduct a full and impartial investigation, remedy any violations of the Company’s policies, or monitor compliance with or administer the Company’s policies.

#### **6. TREATMENT OF ACCOUNTING CONCERNS**

Accounting Concerns will be reviewed as soon as possible by the Audit Committee with the assistance and direction of whomever the Audit Committee thinks appropriate, including but not limited to external legal counsel. The Audit Committee shall implement such corrective measures and do such things in an expeditious manner as it deems necessary or desirable to address the Accounting Concern. Where possible and when determined to be appropriate by the Audit Committee, notice of any such corrective measures will be given to the person who submitted the Accounting Concern.

Any person with an Accounting Concern relating to the Audit Committee itself may submit his/her concern to the Chair of the Board in writing as follows:

Chair of the Board of Directors, in confidence  
Wesdome Gold Mines Ltd.  
220 Bay Street, Suite 1200  
Toronto, ON M5J 2W4

#### **7. NO ADVERSE CONSEQUENCES**

The submission of a Complaint may be made by any employee without fear of dismissal, disciplinary action, or retaliation of any kind as a result. The Company will not discharge, discipline, demote, suspend, threaten, or in any manner discriminate against any person who submits in good faith a Complaint or provides assistance to the Audit Committee, Management, or any other person or group, including any governmental, regulatory, or law enforcement body investigating a Complaint.

## **8. RETENTION OF RECORDS**

The Audit Committee shall retain all records relating to any Accounting Concern or report of a retaliatory act and to the investigation of any such Complaint for a period judged to be appropriate based upon the merits of the submission. The types of records to be retained by the Audit Committee shall include records of all steps taken in connection with the investigation and the results of any such investigation.

## **9. REVIEW AND APPROVAL**

The Governance and Nominating Committee shall review annually this Policy and recommend appropriate changes to the Board.

## **10. COMMUNICATION OF THE POLICY**

To ensure that all Wesdome Representatives are aware of the Policy, a copy will be made available on the Company's website at [www.wesdome.com](http://www.wesdome.com), and all employees will be informed whenever significant changes are made. New Wesdome Representatives will be provided with a copy of this Policy upon joining or being retained by the Company and will be educated about its importance.

## **11. QUESTIONS**

If you have any questions or concerns regarding this Policy, please contact the VP, General Counsel & Corporate Secretary via email at [robert.kallio@wesdome.com](mailto:robert.kallio@wesdome.com).

Dated: November 6, 2024

Approved by: Board of Directors

## APPENDIX ONE

### Procedures for Receiving and Investigating Whistleblower Reports

1. Reports of concerns received by the Company through the whistleblower hotline, by email, or by telephone (collectively, a "Report"), will be communicated promptly by the Audit Committee Chair to the President & Chief Executive Officer.
2. The Audit Committee Chair is authorized to receive and investigate whistleblower reports. In this capacity, the Audit Committee Chair provides counsel to, and acts under the authority of, the Audit Committee.
3. In the event a Report involves or implicates the Audit Committee Chair, the Audit Committee Chair will promptly recuse himself or herself from the investigation and inform the Audit Committee in writing. The Audit Committee may thereafter promptly delegate investigative authority to other members of management or may appoint impartial attorneys to investigate the Report, who will conduct an investigation and report their conclusion to the Audit Committee consistent with this procedure.
4. The Audit Committee Chair will summarize, in reasonable detail, the nature of the Report (including any specific allegations made and the persons involved); the date of receipt of the Report; the current status of any investigation into the Report; and any final resolution of the Report, and provide such summary documents to the Audit Committee who may, in their discretion, share such summary reports with the Board Chair and/or the Governance and Nominating Committee Chair, as deemed necessary and appropriate.
5. The Audit Committee Chair may, in his or her discretion, direct the President & Chief Executive Officer and/or other members of the Company's management team, to investigate the incident in accordance with paragraphs 7 and 8 below, or may retain the matter for investigation by the Audit Committee in accordance with paragraph 9 below.
6. The Audit Committee Chair will promptly investigate the Report and report any recent developments in reasonable detail to the Audit Committee (and, if the Chair so directs, to the full Audit Committee) at or in advance of each regularly scheduled meeting, or more frequently, if warranted. The Audit Committee Chair will keep a record of the results of the investigation in reasonable detail, including a description of the Report, the steps taken in the investigation, any factual findings and corrective actions, if applicable.
7. With the prior approval of the Audit Committee, the Audit Committee Chair will have the discretion to engage outside auditors, counsel or other experts to assist in the investigation and in the analysis of results. The Audit Committee Chair may delegate investigatory responsibility to one or more persons, including persons who are not employees of the Company. All investigations will be conducted in a confidential manner, so that information will be disclosed only as needed to facilitate review of the investigation or otherwise as required by law. The Audit Committee Chair or designees may, if deemed reasonably necessary, require the assistance of the Chief Financial Officer, the Chief Operating Officer, the Vice President, Human Resources, any member of staff of their respective departments, or any other employees of the Company in investigating and resolving any Report.
8. The parameters of any investigation will be determined by the Audit Committee Chair or that individual's designee, and the Company and its employees will cooperate as necessary.
9. The Chair of the Audit Committee may, in its discretion, consult with any member of the Company's management who may have appropriate expertise to assist in the evaluation of a report. The Chair of the Audit Committee will be free in his or her discretion to engage outside auditors, counsel or other experts

to assist in the evaluation of any results of any investigation into a report, and the Company will pay all fees of such auditors, counsel and experts.

10. At any time the Audit Committee may, in its discretion, determine that it, and not the Audit Committee Chair, should initiate and/or assume the investigation of any report. In such instances, the Audit Committee will promptly determine what professional assistance, if any, it needs in order to conduct the investigation. The Audit Committee will be free in its discretion to engage outside auditors, counsel or other experts to assist in the investigation of any report and in the analysis of results, and the Company will pay all fees of such auditors, counsel and experts. In determining that it, and not the Audit Committee Chair, should investigate any report, the Audit Committee may consider such matters as the identity of the alleged wrongdoer, the severity and scope of the alleged wrongdoing, the credibility of the allegations made, and any other factors that are appropriate under the circumstances. The Audit Committee or its designees may require the assistance of the Audit Committee Chair, the Chief Financial Officer, the Chief Operating Officer, the Vice President, Human Resources, any member of staff of their respective departments, or any other employees of the Company in investigating and resolving any report.
11. The Company will respond to Reports as appropriate under the circumstances. The Audit Committee will have the authority to direct that the appropriate corrective action be taken by the Company in response to any particular report.
12. The Company, through the Audit Committee Chair, will aim to keep the reporting person informed of the progress of the investigation and its likely timeframe as appropriate.