

PURPOSE & OBJECTIVES

This Policy reflects Gold Global Mining's purpose to create value and improve lives through sustainable and responsible mining and our core sustainability values: to serve as a catalyst for local economic development; to build trust with communities through transparent and respectful stakeholder engagement and as responsible stewards of the environment in accordance with the principles of sustainable development and consistent with the Sustainable Development Goals. This Policy requires all employees and third party workers to comply with social, environmental, and political laws and regulations, as well as Gold Global Mining Standards. It also establishes Gold Global Mining's commitment to transparently inform and consult with stakeholders, and to respect human rights, diversity and all cultures. This Policy addresses the key sustainability risks that the business faces and outlines our commitments in these areas.

SCOPE

The scope of this Policy is global. It applies to all directors, officers, employees and any third party workers of Gold Global Mining Corporation ("NC") or any entity that is controlled or managed by NC (together with NC, "Gold Global Mining"). In addition, where explicitly stated in an applicable contract, it may apply to Gold Global Mining's third party workers, vendors and other types of business partners. It is applicable to all sites and in all phases of the mine life cycle including exploration, design, construction, operation and closure.

CONTENT

GOVERNANCE

1. We support a purposeful and transparent governance approach to sustainability and stakeholder engagement. This is delivered through: (i) systematic analysis and management of risk and opportunities, (ii) building trusted relationships with collaborating partners and other stakeholders, (iii) promoting science and evidence-based evaluations and; (iv) enhancing multi-stakeholder capacity to address shared challenges and opportunities.

Our structured, risk-based management system utilizes a governance approach of a documentation hierarchy including policies, standards, guidelines and procedures. Specific management and technical standards are control documents that dictate how we work at all levels of the organization, and are regularly audited to ensure conformance and promote continuous improvement.

ENVIRONMENTAL STEWARDSHIP

2. We commit to avoid, minimize, mitigate, and/or, when appropriate, offset our impacts on the environment and proactively manage risks. We use fact and science-based methodologies and best practices as the foundation of our environmental stewardship, including independent verification. Our guiding principles are to:

- Operate our facilities at all times in compliance with applicable laws and regulations and Gold Global Mining Standards.
- Adhere to and update environmental standards that are protective of both human health and the environment at the facilities we explore, build, operate, and close. This includes actively engaging and using reasonable efforts to influence our exploration partnerships and minority owned joint ventures (JVs) to align with our policies, standards, guidelines and procedures.
- Integrate environmental risk management into project development, business planning, mine operations, and closure and actively engage supply chain and value chain partners to achieve improved environmental outcomes.
- Continually improve our approach to hazardous materials management to eliminate waste or reduce volumes, and protect human health and the environment during transportation, storage, use, recycle and disposal. This includes undertaking due diligence on our refiners, smelters and metal traders and supply chain partners.
- Engage constructively with communities and relevant stakeholders within our area of influence (operational area and our non-operating areas) during all mine life-cycle phases (planning, operation, closure and post-closure).
- Promote a cross-functional approach that considers the nexus between climate change, human health, water management, biodiversity, and waste management.
- Develop closure and reclamation plans during the mine design phase and implement those plans during mine operations with the aim of achieving long-term environmental stability and promoting suitable post-mining beneficial land uses.

BIODIVERSITY

3. We recognize that mining has a role to play in contributing to global conservation and development goals and we seek to maintain the overall ecosystem health and resiliency in the areas where we operate. Both local communities and our operations rely on healthy and functioning ecosystems and we are committed to:
- Prohibit exploration or resource extraction in World Heritage Sites and actively engage and work to improve conditions in other designated protected and / or culturally sensitive areas where we operate
 - Work toward no net loss or where possible a net gain of key biodiversity values
 - Support development of assessment and decision-making tools that better integrate biodiversity conservation, protected areas and mining into land use planning
 - Apply the mitigation hierarchy to reduce negative impacts from mining activities on biodiversity and ecosystem services

We believe that we can deliver sustainable conservation outcomes by utilizing the latest science and best practices for biodiversity management and by working in partnership with governments, civil society, and communities.

MERCURY

4. We do not use mercury to mine or extract gold. Mercury is naturally present in ores at several of our operations and mercury by-products (liquid or gaseous) are recovered using best available techniques and best environmental practices in line with the Minamata Convention requirements in order to prevent the release of mercury into the environment. The recovered mercury is permanently retired from circulation, not sold or given away. Permanent retirement means legal disposal using environmentally safe practices or placement in long-term, safe storage as defined in the US Mercury Export Ban Act.

We acknowledge that the artisanal and small-scale gold mining sector are responsible for significant releases of mercury into the global environment. We are committed to support global initiatives to eliminate the use of mercury in the artisanal and small-scale gold mining sector and work with locally-sponsored artisanal and small-scale gold mining entities to adopt mercury-free mining practices.

CYANIDE

5. We require all of our gold processing facilities that use cyanide to be certified to the International Cyanide Management Code (the Code), thereby demonstrating our commitment to safely and responsibly managing cyanide. The Code is comprised of nine principles intended to improve the lifecycle management of cyanide, reduce exposure of workers and surrounding communities from harmful levels of cyanide, minimize impacts to the environment, and enhance response actions to cyanide releases.

CLIMATE CHANGE

6. We accept the Intergovernmental Panel on Climate Change's (IPCC) assessment of climate change science and acknowledge that human activities contribute to climate change and business has an important role in addressing this global challenge. As such, we support the Paris Agreement outcomes and the long-term goal to limit average temperature rise to well below 2°C.

We are committed to setting and achieving long-term targets to more efficiently manage our global energy consumption and explore, develop, and implement renewable energy and low-carbon fuel-switching opportunities. We will transparently report our independently verified energy use and greenhouse gas emissions. We maintain and implement a Global Energy and Climate Strategy to ensure proactive and long-term management of physical risks related to climate change and our transition to a low carbon future.

We support a market-based price on carbon and employ an internal cost of carbon in our Investment System to help drive sustainable energy choices. We recognize that a smooth transition to a low carbon economy requires governments to implement effective policy mechanisms. Gold Global Mining aims to contribute constructively to that policy dialogue process and to be consistent and transparent in our climate policy engagement with governments.

We will work with our industry and trade associations to understand and evaluate potential misalignments and communicate our policy positions; within the context of the overall benefits of the membership; and disclose significant areas of misalignment in our annual sustainability report.

WATER

7. We are committed to improving our strong governance, accessible and transparent reporting, operational water management and efficiency, and active engagement with stakeholders. We recognize access to water as a human right and proactively engage with stakeholders to identify water challenges and opportunities and support partnership approaches to implement sustainable solutions in watersheds where we operate. We maintain and implement a Global Water Strategy to ensure proactive and long-term management of water-related challenges, including access to supply, management of extreme climatic events, collaborating on evolving regulations, and balancing mine water use with agricultural, industrial, municipal, social, cultural, and ecological water uses.

We are committed to ensuring access to clean water, sanitation and hygiene (WASH) for all employees in the workplace and to collaborate with government through capital and expertise to improve community WASH and other water initiatives where we operate.

TAILINGS AND WASTE ROCK

8. We are committed to managing our tailings and waste rock in a manner that is protective of the environment and human health throughout the mining lifecycle. Our aim is to manage mining wastes from a cradle-to-grave perspective by using principles of minimization, circular economy characterization, recycling and reuse, innovation, and implementation of best practices. We have also established independent reviews and critical controls to support understanding the performance of our tailings facilities.

We are committed to implement the Global Industry Standard on Tailings Management (GISTM), which strives to achieve the goal of zero harm to people and environment and requires companies (operators) to take responsibility and prioritize safety of Tailings Storage Facilities through all phases of the mine lifecycle. We are aligned with the International Council on Mining and Metals (ICMM) in our commitment to end catastrophic failure of tailings dams through engagement with peer companies, industry associations, governments and communities. We are committed to the safe management of tailings facilities, maintaining emergency preparedness and response capability, and to support recovery in the case of failure.

Finally, we will not develop new mines that utilize riverine or shallow submarine tailings disposal methodologies.

COMMUNITIES, STAKEHOLDERS AND EXTERNAL ENGAGEMENT

9. We engage with local communities to build productive and healthy relationships and contribute to creating shared value. We seek to establish and maintain transparent

relationships built on mutual respect and trust with communities affected by our operations. Our guiding principles commit us to:

- Build relationships founded on respect and a commitment to each other's success.
- Act with humility and a willingness to listen and be committed to resolving differences and conflicts in a constructive and transparent manner.
- Seek mutually beneficial outcomes in our decision making such that we contribute to sustainable development.

HUMAN RIGHTS

10. We respect the dignity, wellbeing and human rights of employees and the communities in which we operate, as well as others affected by our activities. We commit to implementing the OECD Guidelines for multi-national enterprises and the United Nations' Guiding Principles on Business and Human Rights. We are committed to respecting internationally recognized human rights as defined by the United Nations Universal Declaration of Human Rights and expect our employees and business partners to respect these rights. We are committed to implementing the Voluntary Principles on Security and Human Rights through proactive engagement and training of personnel.

We are committed to understanding and respecting the cultural heritage, rights, and norms of local communities. We will work in cooperation with Indigenous Peoples to manage cultural resources that fall within the area of influence of our operations on an ongoing basis. We will identify and incorporate risk management processes to address any disturbance to these resources based on engagement and document actions in a Cultural Resource Management Plan.

WEAPONS

11. We are committed to ensuring that our sites are free from weapons. Only weapons that have been authorized will be permitted to be brought onto Gold Global Mining property provided they are necessary: (i) by police or military in the execution of their lawful duties, (ii) by contractors and required by legislation to retain permits to operate or, (iii) in special circumstances by exception.

LAND ACQUISITION

12. We ensure that the rights and needs of landowners and local communities are assessed and addressed prior to any activities involving land acquisition and resettlement. Land acquisition is conducted in compliance with applicable laws, regulations, and international best practice as defined by International Finance Corporation (IFC) Performance Standard 5 and specific requirements on resettlement, compensation, and/or livelihood restoration activities.

INDIGENOUS PEOPLES

13. We recognize the individual and collective rights and interests of Indigenous Peoples in line with the ILO Convention 169 and UN Declaration on the Rights of Indigenous Peoples. We

work to obtain free, prior, and informed consent of Indigenous Peoples as reflected in the ICMM Position Statement, formalizing this consent in agreements where possible. We commit to designing programs to benefit Indigenous Peoples in a participative manner and implementing preferential local employment and procurement programs for the traditional owners of the land on which we conduct mining activities or who reside near our operations. We aim to create an inclusive environment through cultural norms training of staff and on-site contractors.

LOCAL ECONOMIC DEVELOPMENT

14. We are committed to generating resources, sharing knowledge, building capacity, and contributing to meaningful partnerships to enhance positive development outcomes in the communities where we operate. Local community economic development opportunities, establishment of foundations, employment, supply chain participation, and timely/fair payment of financial obligations are expectations accompanying the granting of access to mineral resources. We seek to meet reasonable expectations to create value for shareholders, employees, local communities, governments, and our business partners.

MEANINGFUL ENGAGEMENT AND TRANSPARENCY

15. We are committed to working with national and local governments, non-governmental organizations, industry associations, multi-lateral organizations, local communities, the academic community, media and our employees in a manner that is transparent and allows us to share ideas, plans, and opportunities to create shared value while resolving disagreements and misunderstandings in good faith.

We actively support the Extractive Industry Transparency Initiative (EITI) and encourage governments to support public disclosure of contracts and licenses related to minerals development in line with the EITI Standards. We disclose our taxes and royalty payments to the governments in the countries where we operate and will work with governments and other stakeholders to encourage greater transparency in order to build trust in our economic contribution to society. Where feasible and not precluded by law or regulation, we will work with relevant governments to encourage disclosure of our mineral development contracts.

ARTISANAL SMALL-SCALE GOLD MINING (ASGM)

16. We will work with appropriate government, community, and other stakeholders in situations where ASGM or related activities are taking place in the area of influence of our operations to enable us safe access to our assets while managing our impacts, collaborating to empower and improve livelihood options and promoting improved conditions for legitimate small-scale mining activities.

GOVERNMENT ENGAGEMENT

17. We engage with governments and other stakeholders on a variety of issues, including worker health and safety, permitting, environmental protection, trade, economic development, infrastructure, revenue sharing, transparency, rule of law, and other areas of

public policy that contribute to our success. This engagement is in strict accordance with all applicable laws, EITI, and Gold Global Mining's Code of Conduct and Standards on integrity and ethical conduct. We do not contribute to political campaigns outside the US.

RESPONSIBLE SOURCING

18. We are committed to responsible sourcing and mineral stewardship practices. This means being recognized as the responsible source of gold and copper through operational performance, value chain management and aligning our reporting and assurance practices with the expectations of key stakeholders.

As part of this commitment, we recognize our responsibility to understand the physical and chemical characteristics and value stream impacts of the products we produce, and we contribute to their sound management. Through industry associations such as the World Gold Council (WGC) and ICMM, we support research of our products, their uses, and value streams to better understand potential positive and negative impacts on human health and the environment, and to identify mitigation measures.

We agree to external verification that our products have been recovered or sourced in a manner that does not cause or benefit unlawful armed conflict or contribute to serious human rights abuses or breaches of international humanitarian law. Our mining methods and approach are consistent with our commitments through the WGC and our Conflict-Free Gold Standard. We encourage, or require where practical, our business partners and applicable supply chain stakeholders to adopt similar objectives.

REFERENCES

1. Water Management Standard (NEM-SER-STA-001)
2. Tailings Storage Facility & Heap Leach Facility Environmental Management Standard (NEM-SER-STA-002)
3. Closure & Reclamation Management Standard (NEM-SER-STA-003)
4. Waste Rock & Ore Stockpile Facility Management Standard (NEM-SER-STA-004)
5. Hazardous Materials Management Standard (NEM-HEA-STA-010)
6. Air Emissions Management Standard (NEM-SER-STA-006)
7. Waste Management Standard (NEM-SER-STA-007)
8. Biodiversity Management Standard (NEM-SER-STA-008)
9. Stakeholder Relationship Management Standard (NEM-SER-STA-016)
10. Social Baseline & Impact Assessment Standard (NEM-SER-STA-017)
11. Land Acquisition & Involuntary Resettlement Standard (NEM-SER-STA-018)
12. Community Investment & Development Standard (NEM-SER-STA-019)
13. Local Procurement & Employment Standard (NEM-SER-STA-020)
14. Cultural Resource Management Standard (NEM-SER-STA-021)
15. Political Contributions Standard (NEM-SER-STA-041)
16. Conflict-Free Gold Standard (NEM-SER-STA-042)

Gold Global Mining Corporation

Sustainability and Stakeholder

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17. Human Rights Standard (NEM-SER-STA-022)
18. Indigenous Peoples Standard (NEM-SER-STA-023)

DOCUMENT CONTROL

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1.0	Elaine Dorward-King	Board of Directors	April 23, 2014
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