

Human Rights Policy

Marathon Gold Corporation (“Marathon” or the “Corporation”) is committed to the responsible development and operation of the Valentine Gold Project (the “Project”). Our vision is an enterprise balancing commercial success with a safe working environment, effective environmental management and the creation of lasting social benefit to minimize harm and maximize benefits to its employees and all affected stakeholders. We strive to be a good corporate citizen, local partner, safety leader and best-in-class employer.

Consistent with its corporate values of Respect, Accountability, Transparency, Inclusion and Respect, Marathon Gold is committed to integrating human rights into all aspects of our operations and decision-making processes in order to conduct business in a manner that respects the equality, rights and dignity of all people. This policy will apply at every level of the organization to all employees, contractors as well as independent service providers and visitors attending Marathon’s workplaces. We will also aim to identify and work with partners who conduct their businesses consistent with this policy and we will implement practices to evaluate suppliers, consultants and contractors based on this policy.

This policy should be read in conjunction with other relevant company policies including:

- Workplace Violence, Harassment & Discrimination
- Respectful Workplace Policy
- Employee Issues Resolution
- Employee Information Protection
- Code of Conduct
- Whistleblower Policy and Reporting
- Diversity Policy
- Indigenous Relations Policy
- Stakeholder Engagement Strategy
- Stakeholder Grievance Mechanism

Consistent with international standards and domestic human rights legislation and relevant corporate policies, Marathon Gold recognizes that employees, contractors and suppliers are entitled to work in an environment and under conditions that are safe and which respect their rights and dignity. Marathon does not tolerate child labour, prison labour and forced labour, slavery and servitude. Marathon does not tolerate or condone discrimination against any individual or group on the basis of race, colour, gender, gender orientation or gender identity, ethnic affiliation, religion, social origin, family status, disability or political opinion. It respects the right of workers to join or refrain from joining legally authorized associations or organizations, including unions.

As part of its commitment to human rights, Marathon will:

- Treat employees fairly and without harassment or discrimination on the basis of race, colour, gender, gender orientation or gender identity, ethnic affiliation, religion, social origin, family status, disability or political opinion
- Promote gender equity, diversity and inclusion in the workplace
- Consider the safety and wellbeing of all employees, contractors and stakeholders as a priority and protect the safety of those who work at or visit our worksites by taking necessary actions to prevent work-related risks and health hazards
- Operate in full compliance with applicable wage, hours of work, overtime and benefits legislation
- Implement an employee grievance mechanism to address issues related to harassment and discrimination and guarantee freedom from reprisals and retaliation for whistleblowers and complainants
- Reject any form of slavery, forced labour and child labour and recognize the rights of employees to engage in freedom of association and collective bargaining
- Enter into contractual arrangements that encourage the adherence of suppliers and contractors to our human rights commitments
- Acknowledge and respect Indigenous people's land and resource use, cultural values and traditions
- Respect the human rights of stakeholders and provide an accessible and transparent stakeholder grievance mechanism to resolve issues in a timely and effective manner
- Communicate this policy and our commitment to human rights to all stakeholders, including employees, contractors and suppliers and those working within our supply chains and provide human rights training to all employees
- Conduct reasonable human rights due diligence to determine the potential human rights impacts of its operations both at the worksite and in communities and implement reasonable measures to mitigate such impacts
- Communicate procedures and processes respecting the reporting and investigation of human rights violations to employees
- Track and monitor reports of human rights violations and as necessary conduct audits for human rights compliance to ensure that the terms of this policy and related policies and procedures are being met
- Disclose our performance annually in our Sustainability Report