



CORPORATE SOCIAL RESPONSIBILITY POLICY

I. PURPOSE

Red Eagle Mining Corporation (the “**Company**”) and all of its controlled affiliates (collectively, “**Red Eagle**”) are committed to the highest standards of openness and accountability. Red Eagle defines corporate social responsibility to mean:

- conducting business in a socially responsible and ethical manner;
- protecting the environment and the safety of people;
- supporting human rights; and
- engaging, learning from, respecting and supporting the communities and cultures within which we operate.

In alignment with the Company’s Code of Business Conduct and Ethics, Red Eagle endeavors to ensure that all matters of corporate social responsibility are considered and supported in our business operations and are consistent with stakeholders’ best interests. Red Eagle is committed to being a leader in the field of Corporate Social Responsibility and recognizes that in doing so, we will add significant value for shareholders.

This Policy applies to all activities undertaken by or on behalf of Red Eagle anywhere in the world. All employees, officers, directors, consultants, contractors and agents of Red Eagle (collectively, “**Personnel**”) will adopt the corporate social responsibility considerations described in this Policy into their day-to-day work activities. All Personnel will be responsible for promoting honest and ethical conduct, full, fair, accurate, timely and cogent disclosure, and to comply at all times with the laws, policies and other regulations applicable to Red Eagle and its business. Further, Management will ensure that appropriate organizational structures are in place to effectively identify, monitor, and manage corporate social responsibility issues and performance relevant to our businesses.

II. EMPLOYMENT AND EMPLOYEE RELATIONS

Red Eagle will ensure that all Personnel are treated fairly, with dignity, and consideration for their goals and aspirations. In line with the Company’s Diversity Policy, Red Eagle will embrace diversity in its workforce.

Red Eagle is committed to providing equal opportunity in all aspects of employment and will not engage in or tolerate unlawful workplace conduct, including discrimination, intimidation, or harassment. Red Eagle will apply fair labour practices, while respecting the national and local laws of the countries and communities where we operate.

III. BUSINESS ETHICS AND TRANSPARENCY

Red Eagle will conduct its business in an open, honest, and ethical manner. We are committed to maintaining the highest standards of integrity and corporate governance practices in order to maintain excellence in daily operations, and to promote confidence in our governance systems.



Red Eagle prioritizes the protection all of our human, financial, physical, informational, social, environmental, and reputational assets.

IV. ENVIRONMENT, HEALTH AND SAFETY

Red Eagle is committed to protecting the health and safety of all individuals affected by our operations, including Personnel, stakeholders, local communities and the general public. Red Eagle will provide a safe and healthy working environment, and will not compromise the health and safety of any individual to achieve its corporate goals. Our highest priority is to safeguard against occupational accidents and to mitigate any impact on the environment by working with our stakeholders, peers and others to promote responsible safety and environmental practices through a process of continuous improvement.

Red Eagle is committed to environmental protection and stewardship. Red Eagle recognizes that pollution prevention, biodiversity, and resource conservation are key to a sustainable environment, and will effectively integrate these concepts in all of our business models and decision-making.

All Personnel are responsible and accountable for contributing to a safe working environment, for fostering safe working attitudes, and for operating in an environmentally responsible manner.

V. STAKEHOLDER RELATIONS

Red Eagle will engage stakeholders with clarity, honesty, and respect. Red Eagle is committed to timely and meaningful dialogue with all stakeholders, including but not limited to shareholders, customers, employees, communities, governments, regulators, and landowners.

VI. HUMAN RIGHTS

Red Eagle recognizes that governments have the primary responsibility to promote and protect human rights. Red Eagle will work with governments and agencies to support and respect human rights within the scope of our business operations. We will not tolerate human rights abuses, and will not engage or be complicit in any activity that solicits or encourages human rights abuse.

Red Eagle will always strive to build trust, deliver mutual advantage, and demonstrate respect for human dignity and rights in all relationships it enters into, including respect for the cultures, customs and values of individuals and groups.

VII. COMMUNITY INVESTMENT

Red Eagle stresses collaborative consultation, and partnership approaches in our community investment programs. Red Eagle will integrate community investment considerations into decision-making and business practices, and will assist in local capacity building to develop mutually beneficial relationships with communities.

Red Eagle will contribute to our host communities' quality of life by supporting innovative programs in health, education, social services and the environment, as well as cultural and civic projects. We will strive to provide employment and economic opportunities in the communities where we operate.



VIII. GOVERNMENT AND COMMUNITY RELATIONS AND SUSTAINABILITY

All Personnel shall conduct their relationship with government officials and employees in such a way that the integrity and reputation of the Company, the government, and the government officials or employees will not be brought into question.

Red Eagle is committed to conducting its business responsibly with the communities in the areas where it operates and to making a positive contribution to the well-being and development of said communities.

Red Eagle is committed to sustainability practices in our operations. The Company's Technical and Sustainability Committee monitors these practices in accordance with their formal mandate, which includes the documenting, auditing and disclosure of sustainability practices both within and outside of the Company.

IX. CONFLICT OF INTEREST

Personnel are required to act with honesty and integrity and to avoid any relationship or activity that might create, or appear to create, a conflict between their personal interests and the interests of Red Eagle. They shall at all times perform the responsibilities of their positions on the basis of what is in the best interests of Red Eagle and free from the influence of personal considerations and relationships. Personnel shall not acquire any property, security or any business interest which they know that Red Eagle is interested in acquiring.

Personnel are expected to report to the Company's Corporate Secretary any personal interests which conflict or may conflict with the interests of Red Eagle.

Gifts or hospitality from others should not be accepted if they could be reasonably considered to be an improper influence of the employee, officer or director who receives it, or otherwise improperly influence Red Eagle's business relationship with or create an obligation to a supplier, contractor or consultant.

Red Eagle prohibits all forms of bribery, whether they take place directly or through third parties. Red Eagle also prohibits its Personnel, and their immediate families, from soliciting, arranging or accepting bribes intended for their own benefit or that of their family, friends, associates or acquaintances. Neither Red Eagle nor any of its Personnel shall directly or indirectly influence (with money, gifts or promises) any government, official, political party or political candidate in order to assist the Company in obtaining or retaining business or in directing business to any other person.

Personnel, when acting on behalf of Red Eagle Mining, should not make direct or indirect contributions to political parties, organizations or individuals engaged in politics, as a way of obtaining advantage in business transactions. Red Eagle will publicly disclose any political contributions.

If you are in doubt about the legitimacy of a payment that you have been requested to make, or have been offered to accept, refer such situations to the Company's Whistleblowing Policy. Additional information is also available within the Company's Code of Business Conduct and Ethics or by directly contacting the Company's Corporate Secretary.

The Company firmly believes that fair competition is fundamental to the continuation of the free enterprise system. Red Eagle complies with and supports laws of all jurisdictions which prohibit restraints of trade,



unfair practices, or abuse of economic power. As such, the Company will not enter into arrangements that unlawfully restrict its ability to compete with other businesses, or the ability of any other business organization to compete freely with Red Eagle. This Policy strictly prohibits Personnel from entering into or discussing any unlawful arrangement or understanding that may result in unfair business practices or anti-competitive behaviour.

Red Eagle selects its suppliers, contractors and consultants in a non-discriminatory manner based on the quality, price, service, delivery and supply of goods and services. A decision to employ a particular supplier, contractor or consultant must never be based on personal interests or the interests of family members or friends. All management, employees, and partners are required to conduct themselves in a business-like manner that promotes equal opportunity and prohibits discriminatory practices.

The Chairman and Chief Executive Officer (“CEO”) and the Company’s Vice-President, Corporate Development are responsible for all Red Eagle’s public relations, including all contact with the media. Personnel must abide by the Company’s Disclosure Policy and must not respond to inquiries or requests for information.

Employees of Red Eagle shall not act as officers or directors of any other corporate entity or organization, public or private, without the prior approval of the CEO. Officerships or directorships with such entities will not be authorized if they are considered to be contrary to the interests of Red Eagle. The CEO may provide authorizations for officerships or directorships that are necessary for business purposes or for officerships or directorships with charitable organizations or other entities that are positive for Red Eagle’s profile in the community.

X. COMPLIANCE AND REVIEW

It is up to each individual Personnel to comply with this Policy and therefore, individuals will be accountable for such compliance. Failure to adhere with applicable laws/regulations governing the Company’s business, this Policy or other Company policies, may result in disciplinary action including termination and if warranted, legal proceedings.

Red Eagle has established a Whistleblower Policy to handle complaints with respect to, amongst other things, this Policy. The purpose of the Whistleblower Policy is to encourage and enable Personnel to raise serious concerns within Red Eagle without fear of harassment, retaliation or adverse employment consequences. A copy of the Company’s Whistleblower Policy is available on the Company’s website.

The Company’s Corporate Governance and Compensation Committee will monitor compliance with this Policy periodically by liaising with the Board, management and employees especially in relation to any areas of difficulty which arise from the Policy and any other ideas or suggestions for improvement.

This Policy was last approved by the Board on September 15, 2017.