



GORILLA GOLD MINES LTD

Environment, Social and Governance Policy

Approved by the Board, July 2022

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1. ABOUT THIS POLICY

- 1.1 Environmental, social and governance issues do not exist in a silo. ESG is about bringing them together under one banner to demonstrate the positive impact our business is having on the world. ESG is much like corporate social responsibility but on a vastly larger and more measurable scale. Companies who are at the forefront of talking about their ESG scores are generating more attention from across the business spectrum, and investors are actively looking for high ESG scoring companies.
- 1.2 This Policy will inform our ESG efforts moving forward. This includes, but is not limited to reporting, disclosures (both material and non-material), business practices, policies, procedures, investments, board activities, stakeholder engagement, and investor relations.
- 1.3 Nothing in this Policy shall be taken or understood to limit or reduce our current committees, both legally and ethically.

2. PURPOSE OF THIS POLICY

- 2.1 The purpose of this Policy is to provide information about ESG (Environmental, Social and Governance factors) and to encourage the business to understand ESG in more detail.
- 2.2 This Policy has been implemented following throughout Gorilla Gold's business.
- 2.3 This Policy does not form part of any contract of employment or other contract to provide services, and we may amend it at any time.

3. WHO IS RESPONSIBLE FOR THIS POLICY?

- 3.1 The Board of Directors has overall responsibility for the effective operation of this Policy. They have delegated responsibility for overseeing its implementation throughout the business. Suggestions for change should be reported to the Company Secretary.
- 3.2 This Policy is reviewed annually by the Company Secretary and Chief Executive Officer. Changes may be made at any time as ESG guidance develops.

4. OUR ESG COMMITMENT

- 4.1 We strive to build sustainable, equitable, healthy, and diverse communities through a combination of innovative business practises and exemplary environmental, social and governance (ESG) performance. This commitment informs every aspect of our business, including how we design and build new projects, operate our Company, collaborate with stakeholders and report progress.
- 4.2 This ESG Policy sets out our approach to sustainability matters. At the heart of the Policy is a corporate culture that has sustainability at the core of all our business operations and values.

5. OUR STATEMENT ON CLIMATE CHANGE AND THE ENVIRONMENT

- 5.1 We are committed to driving down our energy and carbon impacts, as we believe that climate change is one of the greatest risks to our world. Our sustainability program is committed to environmentally sustainable initiatives that deliver near-term efficiency, value, and health for our business, our people, and the wider community.
- 5.2 We encourage our customers to reduce their impact on the environment by recommending the use of more sustainable materials. We regularly support our clients to avoid printing and we will make all endeavours to be a digital-first business.
- 5.3 We seek to comply with current environmental legislation and work to minimise the impact of our activities on the environment.

6. OUR STATEMENT ON SOCIAL RESPONSIBILITY

- 6.1 Our focus is to deepen relationships with our key stakeholders by investing in our employees and partnering with our customers, communities, investors and suppliers.
- 6.2 We are committed to engage with our employees to provide a challenging, dynamic, inclusive and diverse work environment that supports their professional development, as well as promoting a good work-life balance that prioritises their overall health and wellness.
- 6.3 We will support initiatives that benefit the environment, human welfare and education. This includes skills training that advance workforce talent pipelines for our customers and economic development in the communities in which we operate.
- 6.4 We will engage suppliers, customers and employees around safety, health, and wellness.
- 6.5 We will preserve and promote the protection of human rights and welfare within our own business activities, as well as those of our supply chain, in accordance with our Human Rights Policy, Code of Ethics and Business Conduct, Supplier Code of Conduct, and the Modern Slavery and Human Trafficking Policy.

7. OUR STATEMENT ON ETHICAL GOVERNANCE

- 7.1 Our focus is to promote strong oversight, transparency and risk management at all levels of our organisation, ensuring the resilience and long-term preservation of value for our business.
- 7.2 We will maintain strong corporate governance practices through exemplary board stewardship, management accountability, and proactive risk management.
- 7.4 We are committed to high ethical standards through a strong Code of Ethics and Business Conduct, ongoing ethics training, and executive leadership that promotes a culture of integrity.
- 7.5 We cultivate strong stakeholder relationships through transparency, open communications, and responding to stakeholder input.
- 7.6 We establish clear and effective governance for ESG, set goals and establish accountability. This is set through our Executive and reported to our Board.

8. OUR BUSINESS AND ESG

- 8.1 ESG is about assessing net positive impact in the world, and taking concerted, defined and measurable action to improve it. Our value rests in our employees, our communities, and the wider world. Therefore, ESG forms a fundamental part of how our business lives our values in the real world.
- 8.2 The ethical and practical values that make up the different parts of ESG have always been at the heart of what we as a Company stand for. With the growth of ESG and the increased awareness of these factors among our key stakeholders, we have a better opportunity to tell the story of how our business makes a positive impact in the world.
- 8.3 The drive to assess a broader range of factors in a holistic manner, from environmental and climate change considerations to the social issues and how we invest in our people, to the structure of our business and always reaching for better governance, means we can tell our story better. We welcome opportunities to highlight the positive impact we have on the world.

9. OUR DUTY TO THE WIDER WORLD

- 9.1 As a business, we also have a duty to our people, our customers, and the wider world. ESG gives us an opportunity to bring those impacts together. We value investing in our people as we value protecting our environment and being a good corporate citizen.
- 9.2 Fostering openness, sustainability and respect are our key objectives. We value everyone and strive to work as one team. Our view on ESG is that it is a continuous process of aligning our operations and controls with our values as a Company.
- 9.3 Our commitment to improve our social and environmental performance demonstrates a strong, well-informed management attitude and a values-led culture that is both alert and responsive to the challenges and opportunities of doing business responsibly and sustainably.

10. ESG AND OUR REPUTATION

- 10.1 ESG is fundamental to our reputation as a business. Reputation is built through frequent and repeated interactions with stakeholders. When those interactions are positive, our business, and our reputation, can thrive. In an uncertain economic climate, positive reputation is one of the key drivers to long term success.
- 10.2 We want all our stakeholders, from customers to investors to our people, to be proud to be a part of our business. Part of that pride is understanding how our business makes a positive contribution to the world.
- 10.3 Environmental - Environmental sustainability is an ethical and commercial imperative. Managing our carbon footprint goes hand in hand with the strategic necessity to operate efficiently. Our commitment to tackling climate change at a corporate level is fundamental to our strategic objectives.
- 10.4 Social - Our people make up our business. Intellectual capital is core to our clients, our business model and our long-term sustainability as a business. We aim to foster an environment that values and nurtures unique talents and contributions from every individual within a culture of inclusivity. While we have progress to make, we are committed to cultivating and empowering change by building an inclusive workplace where all talents can thrive.
- 10.5 Governance - Good governance is foundational to our business, and all aspects of ESG. We cannot thrive without paying attention to our compliance obligations. Our business seeks to go beyond the concept of 'box-ticking' and embed compliance into the heart of our business.

11. OUR RESPONSIBILITY TO OUR STAKEHOLDERS

- 11.1 We have an obligation to our Stakeholders. Stakeholders are at the heart of our business, and without these partnerships our business wouldn't exist. Part of that commitment to stakeholders is about responding to their needs, hearing their concerns and committing ourselves to increasing stakeholder satisfaction.
- 11.2 The best stakeholders are those who see us as partners in their own enterprise. In turn, those stakeholders reward us with their continued support, and building and maintaining our strong reputation.
- 11.3 ESG priorities are drawn not only from investor concerns but stakeholder needs. Stakeholders are asking how we are improving the world around us? How are we protecting our shared environment, investing in our communities and being good corporate citizens? It is imperative to us as a business that all of our interactions with stakeholders are reflective of who they expect us to be - a Company they are proud to work with and recommend.
- 11.4 That is why it is important for you to understand ESG, its impact and what it means for our Company. We want you to feel proud of being part of our business and the positive impact we have on the world, so that our stakeholders will feel the same.

12. ESG AND OUR VALUE CHAIN

- 12.1 Our business does not operate in isolation; value is created through collaboration and partnerships. Similarly, risks can generate from inability to anticipate problems, gatekeeping, and hiding critical information. Traditional risks in supply chains were generally about quality, cost effectiveness and reliability. However, through an ESG lens, the holistic nature of the third parties, from how they source raw materials to how they treat workers and comply with accepted standards, are just as vital.
- 12.2 A workforce health and safety incident, labour dispute or allegation of corruption can have serious impacts on stakeholders up and down the value chain; the value chain matters, and it is connected. Investors are increasingly voting with their feet and putting pressure on companies to act with ethical decisions in mind.
- 1.3 Ethical procurement gets to the heart of the value chain. When we consider the entire value chain, from raw material supplier to end use customer, we can better understand the needs and impacts of our business decisions within those relationships. Ethical procurement within the context of ESG means paying attention to the carbon impacts of a supplier, and the labour practises of an end-user.
- 12.4 Considering these impacts doesn't always mean refusing to work with someone in the value chain where there are concerns. It is about understanding the risks within each relationship and taking concerted action to reduce those risks. For example, if concerns exist regarding the labour practises of a supplier, we can ensure clauses are inserted into contracts to maintain an adequate standard of employment for those working for the supplier. This can help actively change labour practises, as opposed to simply refusing to work with a supplier. When working with a logistics provider, we might ask for emissions reporting so we can then offset the carbon used.

13. MONITORING AND ENFORCEMENT

- 13.1 We seek to proactively prevent and mitigate instances of non-compliance with this ESG Policy.
- 13.2 Any breaches or concerns, including ethical concerns or potential breaches in our commitment to high ethical standards should be reported as soon as possible through our whistleblowing channels.
- 13.3 Progress on this Policy is reported to the Board. Active participation and engagement at all levels of the business is of great importance to ensure ownership of ESG by all staff. We are fully committed to maintaining compliance with legislative requirements in all jurisdictions in which we operate.