



HUMAN RIGHTS POLICY

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1 Introduction

BULGOLD Inc. together with its subsidiary companies (together, the “Company”) is committed to respecting the human rights of all individuals impacted by our activities, including employees, contractors, workers in our supply chain and external stakeholders. “External stakeholders” are understood to mean residents of the communities in which the Company has activities, as well as the employees of third-party service providers and other non-employees whose human rights may be directly impacted by the Company’s operations. This Policy is not intended to supersede local laws, but rather to support host governments in the protection of human rights and the prevention of human rights abuses. While governments have the legal obligation to protect against human rights violations, the Company recognises its corporate responsibility to respect human rights.

In our activities, we seek to avoid causing or contributing to human rights violations and to facilitate access to remedy. “Human rights” are understood to mean all internationally recognised human rights that are found in the International Bill of Human Rights (composed of the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights and the International Covenant on Civil and Political Rights) and the labour standards that are found in the core conventions of the International Labour Organisation. We also support the United Nations Guiding Principles on Business and Human Rights, the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises and the Prospectors and Developers Association of Canada e3Plus Framework for Responsible Exploration (Excellence in Social Responsibility).

This Policy is applicable to employees, directors and officers (collectively “Employees”) as well as all third parties working for and on behalf of the Company including but not limited to suppliers, contractors, consultants, brokers, agents, customers, donation or sponsorship beneficiaries and their respective subcontractors (collectively “Third Parties”).

2 Objectives and Scope

The Company is committed to:

- complying with all applicable laws in the countries where we operate as well as with other rules, codes and standards to which we subscribe;
- respecting the human rights of our employees, local community members and other stakeholders that may be impacted by our business activities;

- we also expect all our business partners, contractors and suppliers to share our commitment to respecting human rights including those which address working conditions, freedom of association, freedom of speech, collective bargaining, maximum working hours, minimum wages, equal opportunity and freedom from discrimination;
- not tolerating any discrimination against any individual on the basis of race, gender, religion, political opinion, nationality, age, social status or social origin, sexual orientation, or any other arbitrary characteristic for the purposes of recruitment, training and promotion;
- not tolerating the use of any form of child labour, prison labour, forcibly indentured labour, bonded labour, slavery, servitude or any form of human trafficking;
- not tolerating disrespectful or inappropriate behaviour, harassment, intimidation or unfair treatment, or retaliation of any kind by our employees, suppliers or business partners;
- not tolerating threats, intimidation or attacks against human rights defenders.
- upholding individual privacy and freedom of thought, expression, belief and opinion;
- ensuring that we provide fair, stable and safe working conditions for all employees and contractors;
- fostering an equitable, diverse and inclusive workplace, including providing equal remuneration for male and female employees;
- recognising and respecting the freedom to join or refrain from joining legally authorised association or organisations; and
- respecting the rights of local communities near our sites of activity and ensuring that all relevant stakeholders are engaged and measures taken to respect their rights.

3 Implementation

In order to implement this Policy, the Company will ensure that:

- it will provide human rights training to all new and existing Employees;
- it will conduct human rights due diligence to determine actual and potential human rights impacts of its activities and will seek to employ reasonable measures to mitigate any such impacts;
- it will create procedures and mechanisms for the reporting and investigation of suspected human rights violations;
- the reporting of suspected human rights violations can be done anonymously at the Whistleblower Hotline (see section 7 of this Policy for details); the persons who report suspected human rights violations are protected from retribution;
- it will engage with local stakeholders to address their human rights concerns;
- in the case of Third Parties, it will perform reasonable human rights due diligence and require that human rights terms and conditions are included in contracts and where necessary, it will require periodic human rights reporting and certifications (Third Party services providers and suppliers will be required to comply with this Policy as well as the Company's Code of Business Conduct and Ethics and the Supplier Code of Conduct); and
- in cases where the Company determines that its Employees or Third Parties acting on its behalf, have caused human rights impacts, it will consider appropriate mechanisms to mitigate such impacts and remediation.

4 Communication of the Policy

All Employees and Third Parties will receive a copy of the Policy and will be informed whenever significant changes are made. New Employees will be provided with a copy of this Policy and will be educated about its importance.

5 Reporting Responsibility

It is the responsibility of all Employees and Third Parties to comply with the law and the Company's codes and internal policies, and to report any incident, wrongdoing or violations or suspected violations of this Policy.

6 Acting in Good Faith

Anyone filing a complaint or reporting an incident, wrongdoing or a violation, or suspected violation of this Policy, must be acting in good faith and have reasonable grounds for believing the information disclosed. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

7 Reporting Procedure

Any Employee or Third Party that wishes to report an incident or a complaint about the Company should try to contact their supervisor or manager responsible for the group which provides the relevant service, recognizing however, that this depends on the seriousness and sensitivity of the issues involved and who is suspected of wrongdoing.

As an alternative, complaints or reports under this Policy may be submitted on a confidential basis to the Chair of the Environmental, Social, Governance and Nominating Committee (“ESGN Committee”) of the Board by sending a sealed letter by mail (or other delivery) addressed to 82 Richmond Street East, Toronto, ON M5C 1P1. The letter should be marked “Private and Confidential – Attention: Chair of the Environmental, Social, Governance and Nominating Committee.” The letter will be delivered unopened to the Chair of the ESGN Committee. The Chair of the ESGN Committee may also be contacted through the anonymous Whistleblower Hotline as follows:

DSA Corporate Services Inc.

DSA Whistleblower Integrity Hotline

Toll Free Telephone Hotline (for Canada, US, North America or other):

1 – 844 – 900 – 1001

Secure email submission to: integrityhotline@dsacorp.ca

8 Handling of Reports

Following the receipt of a report, a report handling process is triggered and will typically include:

- conducting an initial assessment;
- forming an investigation team, as required;

- conducting an investigation and notification of the authorities, if necessary;
- resolution, including recommendations of corrective actions, as required;
- feedback to the Reporter and other stakeholders; and
- case closure.

9 Linkages with other Policies

Ensuring respect for human rights in accordance with this Policy also requires adherence to other BULGOLD policies, including, among others: the Code of Business Conduct and Ethics, Supplier Code of Conduct, Sustainability Policy, Health and Safety Policy, Whistleblower Policy, Anti-Bribery and Anti-Corruption Policy and the Diversity Policy.

10 Waiver

No waivers from this Policy are permitted.

11 Retention of Records

Records relating to any incident or report filed and to the investigation of any such report, shall be retained by the Company in accordance with the Records Retention and Destruction Policy.

12 Review of the Policy

The ESGN Committee will review and evaluate this Policy regularly, to determine whether it is effective and will submit any recommended changes to the Board of Directors for approval. Employees and Third Parties will be fully informed of any material revisions to this Policy.

13 Queries

Any Employee with questions about how this Policy should be followed in a particular case should contact their supervisor. All interested stakeholders are invited to comment on this Policy and to suggest ways in which it may be improved. Queries, comments and

suggestions should be addressed to the Chair of the ESGN Committee at information@BULGOLD.com

14 Publication and Approval

This Policy will be posted on the Company's website at: www.BULGOLD.com

Approved by the Company's Board of Directors on: 27 April 2023