



HARASSMENT POLICY

This policy applies to all workers, contractors, and site visitors (“workers”) to Casino Mining Corporation’s (“Casino”) Casino Project. Casino is a wholly owned subsidiary of Western Copper and Gold Corporation.

PURPOSE OF POLICY

Casino will not tolerate harassment of its workers by anyone within or outside the organization. The purpose of this policy is to ensure that all workers are aware that harassment on any grounds listed in this policy is prohibited.

DEFINITION OF HARASSMENT

Harassment is any behaviour that demeans, humiliates, or embarrasses a person, and that a reasonable person should have known would be unwelcome. It includes actions (i.e. touching, pushing) comments (i.e. jokes, name-calling) or displays (i.e. posters). It may be a single incident or continue over time.

Harassment is any action that makes a colleague, worker, or client feel degraded, humiliated, or embarrassed. It includes, but is not limited to, jokes, comments, insults, touching, pinching, leering, posters, cartoons, email, and telephone calls. It includes conditions of employment that are degrading, humiliating, or sexual, and i.e. requests for sex, that the worker believes they must go along with to keep the job or get a promotion, raise transfer, or some other benefit of employment, or to avoid being penalized.

Some examples of harassment include:

- Unwelcome remarks, slurs, jokes, taunts, or suggestions about a person’s body, clothing, race, national or ethnic origin, colour, religion, age, sex, marital status, family status, physical or mental disability, sexual orientation, criminal or summary conviction, or other personal characteristics;
- Unwelcome sexual comments, invitations, or requests (including persistent, unwanted contact after the end of a relationship);
- Displays of sexually explicitly, sexist, racist or other offensive or derogatory material;
- Written or verbal abuse or threats;

- Practical jokes that embarrass or insult someone;
- Leering (suggestive staring) or other offensive gestures;
- Unwelcome physical contact, such as patting, touching, pinching, hitting;
- Humiliating a worker in front of co-workers;
- Vandalism of personal property; and,
- Physical or sexual assault

Harassment can take place in the workplace itself, or outside of the workplace in a situation that is in some way connected to work. Harassment will not be tolerated in any work-related place or at any work-related event.

What is not Harassment?

1. Consensual Banter or Relationships

Two or more workers bantering back and forth is not harassment if everyone involved is in agreement. But if any worker, including a worker not directly involved in the banter, feels uncomfortable with this behaviour, and the behaviour continues even after that person has expressed their discomfort, or if the others involved should have known the person was uncomfortable, then it is harassment.

2. Legitimate Management Intervention

Appropriate performance reviews, counselling and discipline are not harassment.

WORKERS' RIGHTS & RESPONSIBILITIES

This section will tell workers how they can expect to be treated at work, and what workers' responsibilities are toward co-workers, supervisors, and the public. Specific information about the complaint process is in the Procedures section, below.

Respect others

Each worker has the right to be treated fairly and respectfully in the workplace. Each worker also has the responsibility to treat co-workers in a way that respects individual differences. No matter what your position, or that of the people with whom you interact at work, showing mutual respect and consideration will make work easier for all of us. If you have doubts about whether a joke, comment, or other behaviour will embarrass, humiliate, degrade or otherwise bother someone, then don't say or do it.

Speak up

If someone behaves in a way that offends harms, humiliates, or degrades you, do not put up with it. First, if you feel that you can speak to that person, do so. Tell them the behaviour is inappropriate. If they continue the behaviour, or if you do not feel you can speak directly to the person, you have several options.

Report harassment

If you observe a co-worker or other person behaving in a way that seems to be embarrassing or harassing someone else, you can and should speak up. You can let them know in a respectful way that you think the behaviour is inappropriate. If you think someone is being harassed, you can let that person know you support him or her in ending the situation. Depending on the circumstances, you may want to say something as the behaviour is happening, or you may decide to speak privately with either of the people involved.

All workers have a responsibility to co-operate in the investigation of a harassment complaint. Anyone who gives evidence in an investigation, or who is otherwise involved in the process, must keep this information confidential, except as is necessary to deal effectively with the complaint. These are serious issues, and people's privacy must be respected. Even once a complaint is resolved, confidentiality and respect for privacy are important.

Harassment Training

All employees of Casino are required to complete the Workplace Violence and Harassment Course, within 4 weeks of the commencement of employment. The cost of the course will be paid for by Casino and the course may be completed on paid time.

EMPLOYERS' AND MANAGERS' RESPONSIBILITIES

Put a stop to harassment

Casino has full responsibility for making sure the work environment at the Casino Project is free from harassment. All managers at Casino also have a responsibility to stop harassment. If you, as a manager, become aware of harassment in your work area, or elsewhere in the organization, you must do everything you can to stop it, whether or not a complaint has been made. You cannot turn a blind eye. If a reasonable person should have known that harassment was going on, you will still be held responsible if you let the situation continue.

Be aware

Being aware of the following things can help alert you to problem situations:

- An unexplained change in a worker's performance;
- Someone suddenly taking more sick leave;
- A worker isolating themselves, seeming distracted;
- Not participating in office socializing;
- Rumours; or,
- Awkwardness or discomfort between two or more workers.

Listen to workers

If something doesn't seem right, talk to the worker you are worried about. Often, having someone listen to them can help a person talk about a problem. Of course, we encourage managers to be sensitive to workers' rights and dignity, and to keep these discussions and any ensuing discussions confidential, except as is absolutely necessary to effectively deal with any complaint.

Coordination

If a harassment issue arises any supervisor who becomes aware of a harassment issue will notify the CEO or report through Western Copper and Gold's Whistleblower Hotline as outlined in the Whistleblower Policy.

Whistleblower Hotline

1-866-921-6714

westerncopper@whistleblowersecurity.com

ANTI-HARASSMENT POLICY PROCEDURES

If you are being harassed

The following steps will tell you what to do if you or someone else is being harassed. This section will also tell you exactly what you can expect from the complaint process, what the possible remedies and penalties for harassment are, how to appeal and how to give feedback on this policy to Casino.

Speak Up

The first thing to do if you are being harassed is to tell the person harassing you to stop, if possible. Let them know that you are embarrassed, humiliated, demeaned, or otherwise bothered by what they are doing or saying. You could speak to the person directly, or write them a letter. If you write a letter, date it and keep a copy. Often, a person may not be aware that her or his behaviour is bothersome, and will change the behaviour once they realize this.

Make Notes

You should also make a note of what the bothersome behaviour was, the date it happened, how you felt, what you did about it, and who else was present, if there were witnesses. Ideally, the harassment will stop. If it does not, continue to keep notes.

Informal Procedures

Speak to your supervisor. It may be that communicating directly with the person will not be enough, or that you feel unable to deal with her or him directly. In that case, you can speak to the Camp Manager, or if you feel that is inappropriate, the Manager of Human Resources, CFO, President/CEO, Executive Chairman or one of the Board of Directors.

The superior you speak to will ask you for details of what happened, will make sure you understand the policy and any other options you have, and will ask how you want to proceed. You may ask them to help you write a letter or to speak to the harasser on your behalf. You may ask them to arrange for mediation between you and the person whose behaviour offends you. You may also immediately file a formal complaint or, if you feel that would not be productive; you may go directly to the B.C. Human Rights Tribunal.

BC Human Rights Tribunal

www.bchrt.bc.ca

1-888-440-8844

You may report the event through Western Copper and Gold's Whistleblower Hotline as outlined in the Whistleblower Policy whereby there will an appointed mediator, from within the organization or from outside it, who is acceptable to both parties, is

not otherwise involved in the complaint, and who will not be asked to represent the organization at any stage of any proceedings related to the complaint.

CORRECTIVE ACTION FOR HARASSERS

Someone who has harassed another person will be subject to discipline up to and including termination from employment depending on the severity of the harassment and whether the harassment continues after an investigation or warning. Forms of discipline may include:

- A written reprimand;
- A requirement that the harasser apologize to the complainant;
- A suspension, with or without pay;
- Termination without severance

If the investigation does not find evidence to support the complaint, there will be no documentation concerning the complaint placed in the file of the alleged harasser. When the investigation reveals harassment occurred, the incident and the discipline which is imposed on the harasser will be recorded in the harasser's file.

COMPLAINTS MADE IN BAD FAITH

In the rare event that the complaint was made in bad faith – in other words, the person making it had absolutely no basis and deliberately and maliciously filed the complaint – that person will be disciplined and the record of the incident will be put in her or his file.

CONFIDENTIALITY

Casino will not disclose a complainant's or alleged harasser's name, or any circumstances related to the complaint, to anyone, except as necessary to investigate the complaint or take disciplinary action related to the complaint, or as required by law. Managers involved in a complaint are reminded to keep all information confidential, except in the above circumstances. Casino will take all reasonable steps to protect confidential information.

RETALIATION

Retaliation is considered a serious breach of this policy and can lead to discipline up to and including termination from employment. Anyone who retaliates in any way against a person who has complained of harassment, given evidence in a harassment investigation, or been found guilty of harassment, will themselves be considered guilty of harassment and penalized accordingly. The possible penalties are the same as those assessed against harassers.

APPEAL

If either the person laying the claim of harassment, or the person accused of harassment feels that the ruling of the investigator, the subsequent acceptance of that ruling or disciplinary action resulting from that ruling are unjustified they may request that the Compensation Committee of the Board of Directors undertake a review and determine further action to be taken, if warranted. Such a review will take place within two weeks of the request being received in writing.

If you have any concerns with the policy, please bring them to the attention of the CEO or report through Western Copper and Gold's Whistleblower Hotline. Your comments are always welcome. There is no place for harassment in the workplace that strives for equality and respect for all its members. Casino has committed itself to that goal, and we will do our utmost to achieve it.

Approved:



Name: Paul West-Sells
Title: Chief Executive Officer
Date: May 25, 2020