



## INTEGRITY VIGILANCE POLICY

### OBJECTIVE AND SCOPE

Canadian Malartic GP (the “**Partnership**”) is committed to the highest possible standards of openness, honesty and accountability as its various stakeholders are expecting this and are entitled to it.

The Partnership wants to know about dishonest, fraudulent, unacceptable behaviour, conduct and practices made by its employees regarding accounting, internal accounting controls or auditing, bribery and corruption, harassment in the workplace, or other related matters (a “**Questionable Event**”) and expects them and, as applicable, those of its affiliated entities, including but not limited to Canadian Malartic Corporation (the Partnership and its affiliated entities are hereinafter referred to as the “**CM Group**” and the term “**employees**” refers to employees, officers and consultants of the Partnership; for practical reasons, the masculine gender includes the feminine) to feel comfortable about disclosing and reporting in confidence on any concerns they may have about any Questionable Event they are aware of.

In line with the Partnership’s above-stated commitment, this Integrity Vigilance Policy (the “**Policy**”) is structured as a formal tool to allow the receipt, retention and treatment of complaints, reportings, warnings and any form of notice by any employee of the CM Group or third party regarding a Questionable Event.

### BACKGROUND AND INTERNAL REPORTING

Employees are often the first ones to realize that there may be something wrong within the CM Group. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or to the CM Group. By the same token, it may also be easier for colleagues or superiors of such employees to ignore their concerns so raised rather than address same or report through higher echelons what might just be a suspicion of fraudulent or wrongful practices.

The Partnership expects employees who have reasonable grounds for believing there is a Questionable Event within the CM Group to come forward and voice those concerns responsibly.

This Policy is intended to encourage and enable employees to voice their concerns regarding any Questionable Event within the CM Group rather than ignoring them or reporting outside the CM Group prior to having proceeded with the mechanism provided hereunder.

Any employee who finds his concerns about a Questionable Event not satisfactorily addressed by his immediate supervisor (or higher-ranking persons) or who feels that the

seriousness and sensitivity of the issues or people involved require that the reporting of such Questionable Event should neither be addressed to the attention of his immediate supervisor, nor follow the hierarchical ladder, should contact the Partnership's Secretary (the "**Integrity Vigilance Officer**") at:



1-888-ETHIQUE (1-888-384-4783)



[ethics@canadianmalartic.com](mailto:ethics@canadianmalartic.com)



Secretary  
2140, Saint-Mathieu  
Montréal (Québec)  
H3H 2J4

Employees who wish to make a written report are invited to provide:

- the background and history of the Questionable Event (giving relevant dates);
- the reasons prompting the particular concern about the situation;
- the extent to which the employee has personally witnessed or experienced the Questionable Event (provide documented evidence where possible).

## **BACKGROUND AND EXTERNAL REPORTING**

The Partnership wants to ensure that the community at large and the stakeholders also have a reporting channel by which they can raise any concerns regarding unethical behavior. The Partnership encourages the reporting by members of the public of Questionable Events, breaches or suspected breaches to the Partnership's Code of Conduct and other policies and procedures, and any concerns which are in the public interest to be reported. Such reportings provide the Partnership the opportunity to reinforce its various policies and procedures, and to make any changes when appropriate.

To this end, the Partnership has put in place an anonymous helpline that allows members of the public to report Questionable Events and complaints or concerns regarding inappropriate conduct. The helpline is available on a 24 hour/365 days basis and is operated by an independent third-party supplier who gathers information from the reporting party in a confidential manner.

Members of the public who become aware of any Questionable Event within the CM Group or who have any complaints or concerns regarding unethical behavior may report the issue by calling the following toll-free number:



1-866-943-7606

**SAFEGUARDS AGAINST RETALIATION, HARASSMENT OR VICTIMIZATION**

The Partnership acknowledges that one’s decision to report a Questionable Event can be a difficult one to make. Persons who raise serious concerns should have nothing to fear. Therefore, the CM Group does not tolerate any retaliation, harassment or victimization (including informal pressures) and will take appropriate action to protect persons who raise any concerns under this Policy in good faith (a “Concerned Person”).

**EXAMPLES OF REPORTING MISCONDUCT**

Examples would include:

- violation of any applicable law, rule, or regulation that relates to corporate reporting and disclosure;
- fraud or deliberate error in the preparation, evaluation, review, or audit of any financial statement of the CM Group;
- fraud or deliberate error in the recording and maintaining of financial records of the CM Group;
- non-compliance with the internal policies, procedures and controls of the CM Group;
- misrepresentation or a false statement by or to an employee of the CM Group respecting a matter contained in the financial records, reports, or audit reports;
- fraud or theft;
- offering or accepting a bribe;
- unlawful, corrupt or irregular use of the CM Group’s funds or resources;
- an act, omission, or course of conduct that constitutes a serious risk to health, safety or the environment; and
- harassment of employees or other persons, whether it be verbal, sexual, or physical, as well as any behavior that is not compliant with the Partnership’s Code of Conduct;

Serious wrongdoing is not limited to the above-referenced examples.

## **CONFIDENTIALITY**

All expressions of concerns or reports on Questionable Events within the CM Group, filed with the Integrity Vigilance Officer pursuant to this Policy, will proceed internally on a confidential basis.

## **ANONYMOUS ALLEGATIONS**

Expressions of serious concerns or reports on Questionable Events within the CM Group filed with the Integrity Vigilance Officer on an anonymous basis will be treated appropriately.

## **UNTRUE ALLEGATIONS**

In the event an employee makes in good faith an allegation that is not confirmed by subsequent investigation or otherwise, no action shall be taken against him. Conversely, in the event an employee makes an allegation frivolously, maliciously or for his personal gain, the appropriate disciplinary or legal action will be taken against him, including possible dismissal for cause.

## **RECORDS AND REPORTING**

The Integrity Vigilance Officer will maintain a record of concerns raised and the outcomes (but in a form which does not endanger the confidentiality of a Concerned Person's identity where necessary) and will report to the Voting Members of the Management Committee of Canadian Malartic Corporation (the "**Voting Members**"), and, as necessary, to management.

## **INVESTIGATION**

The Voting Members will determine, on behalf of the Partnership, the steps to be taken to address the concern appropriately and decide whether an investigation is appropriate. If an investigation is necessary, the Voting Members will establish what form it should take, as well as any other parameters (appointment of investigators, timetable, etc.), and whether the investigation will be conducted independently.

A Concerned Person shall be informed of the outcome of any investigation or of any treatment of his claim or notice (this, of course, may not apply to anonymous allegations).