

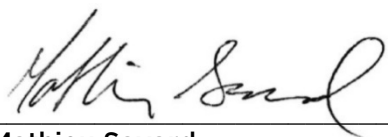
Windfall Mining Group considers providing mutually beneficial business opportunities to our local stakeholders to be an integral part of the application of our six core values: safety, respect, diversity, integrity, efficiency, responsibility. Windfall Mining Group understands the importance of rigorously maintaining and continuously improving an exemplary approach to responsible procurement.

Windfall Mining Group is committed to:

- Establishing ongoing relationships with entrepreneurs and suppliers creating efficiencies in our supply chain that ensure reliable and timely access to required supplies and services while maximizing economic efficiency;
- Not compromising on quality, delivery, service, environmental, health, safety and any other technical requirements;
- Strictly complying with laws and regulations in our relevant jurisdictions;
- Respecting and promoting human rights;
- Strictly complying with our code of conduct and ethics, governance guidelines, and other relevant policies, procedures and signed agreements with our host communities;
- Contributing to the economic development of our host communities by promoting local purchasing;
- Enabling access and minimizing barriers that inhibit participation of local suppliers of goods and services to supply chain opportunities arising from our activities;
- Communicating clearly and in a timely manner, our needs, opportunities, requirements and standards;
- Adapting procurement approaches and strategies to meet the uniqueness of each site;
- Encouraging the development of viable local businesses that meet our needs, requirements and standards, particularly businesses owned by Aboriginal people, women or underrepresented groups or promoting these groups;
- Integrating environmental performance considerations into the procurement decision-making process that reduce harmful impacts on the environment and use natural resources efficiently;
- Aiming for continuous improvement by implementing procurement guidelines, annually reviewing our commitments and objectives, collecting and analyzing statistics, conducting audits and developing plans and targets to improve performance and increase positive impacts for local stakeholders; and
- Ensuring that the necessary resources - human, material and financial - are available to promote, plan and implement this policy.

In order to achieve our responsible procurement objectives, Windfall Mining Group expects:

- All executives, managers and supervisors to be ambassadors in promoting and maintaining our responsible procurement approach with a specific focus on promoting local businesses, and accepting responsibility for the elimination of potential risks;
- The Procurement and Finance Departments to support this policy by developing, implementing and maintaining standards, protocols, and internal controls to achieve performance targets and support on-site activities;
- All employees, subcontractors and suppliers of goods and services to be responsible for carrying out their activities according to this policy;
- Procurement issues are presented regularly to the Board of Directors' Audit Committee to monitor our performance, including all corrective measures, and to confirm that Windfall Mining Group adheres to this policy.



Mathieu Savard
Managing Partner Director
Windfall Mining Group