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## WHISTLEBLOWER POLICY

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### Background

Ensign Minerals Inc. (the “**Corporation**”) is committed to conducting itself with honesty and integrity. If, at any time, this commitment is not followed or appears in doubt, the Corporation needs to have these failures or concerns identified and remedied. The Corporation believes that good and meaningful communication at all levels within the Corporation, without fear of reprisal or redress, promotes success.

### Purpose

The purpose of this Whistleblower Policy (the “**Policy**”) is to provide direction to all current and former directors, employees, officers, consultants, agents, and partners of the Corporation regarding the communication of concerns with respect to issues of honesty and integrity, and, in particular, of questionable financial or operational matters as set forth in the definition of Whistleblower Incidents.

### Policy

#### 1. Definitions

“**Board**” means the board of directors of the Corporation

“**Corporation**” means Ensign Minerals Inc.

“**CEO**” means the President and Chief Executive Officer of the Corporation.

“**CFO**” means the Chief Financial Officer of the Corporation.

“**Whistleblower**” means any current or former director, employee, officer, consultant, agent, and partner of the Corporation who has reported a Whistleblower Incident.

“**Whistleblower Incident**” means a concern related to issues of honesty and integrity within the Corporation including without limitation issues relating to financial or operational matters. For greater clarity, Whistleblower Incidents are intended to include, but are not limited to the following:

- Actual or apparent breach or violation of the Corporation’s Code of Conduct & Ethics;
- Actual or apparent breach or violation of the Corporation’s Corporate Disclosure & Insider Trading Policy;
- Actual or apparent breach or violation of any other policy adopted by the Corporation;
- Conduct considered an endangerment of health and safety;
- Gross mismanagement or omission or neglect of duty;
- Mismanagement in the use or failure to use funds, including, inappropriate recording or reporting of revenues, or lack thereof;
- Inappropriate classification or presentation of assets and/or liabilities in financial records and statements;

- Concealment of any of the above or any other breach of this Policy.

## **2. Authority**

The Corporation's CEO, and if the CEO is the subject matter the Whistleblower Incident, the Corporation's CFO, shall have overall authority for this Policy. The CEO and/or CFO shall have specific responsibility to facilitate the communication and operation of this Policy including the reporting and administrative processes described in paragraph 3.

### **Process**

#### **3. Whistleblower Incident reporting**

- 3.1** The Whistleblower must immediately communicate a Whistleblower Incident as soon as the Whistleblower becomes aware of such situations.
- 3.2** The Whistleblower is encouraged to communicate the Whistleblower Incident to any one of the CEO, CFO or any Corporation Board member.
- 3.3** A Whistleblower Incident may be received verbally (by phone or in person) or in writing (by mail, fax, email).
- 3.4** The individual to whom the Whistleblower reports a Whistleblower Incident will be responsible for investigating and directing the matter to the appropriate individual or individuals within the Corporation with authority to deal with and otherwise resolve concerns or reports of a Whistleblower Incident made under this Policy.

The CFO and/or the CEO shall report Whistleblower Incidents reported under this Policy to the Corporate Governance & Nominating Committee Chair. The Corporate Governance & Nominating Committee Chair will report all matters brought before it pursuant to this Policy to the Corporate Governance & Nominating Committee unless he or she determines that it would be inappropriate.

- 3.5** Once received, the submission is assessed by the Corporate Governance & Nominating Committee and a recommendation on an investigation protocol is sent to the CEO, CFO, and the Chair of the Corporate Governance & Nominating Committee or such of them not otherwise involved in the Whistleblower Incident. Consensus is reached and then the appropriate action and investigation commences, involving appropriate levels of management and the Board dependent on the scope and severity of the Whistleblower incident reported. The CEO, in consultation with the CFO, and Chair of the Corporate Governance & Nominating Committee or as many of them not otherwise involved in the Whistleblower Incident may, refer any Whistleblower Incident for review by an independent third party approved by the Corporation Board. A Whistleblower Incident involving the CEO, CFO, Board Chair or any member of the Board may be referred to an independent third party as noted above at the discretion of the Board.
- 3.6** All Whistleblower Incidents shall be communicated and resolved using the Corporation's prescribed procedures.
- 3.7** The Whistleblower will not be discharged, demoted, suspended, threatened, harassed, or in any other manner discriminated against as a result of communicating a genuine Whistleblower Incident. Any Corporation employee found to be in violation of this Policy (i.e. continued harassment of the Whistleblower) may be subject to termination of employment.
- 3.8** The Corporation will not protect a Whistleblower who intentionally makes false accusations in reporting of a Whistleblower Incident.
- 3.9** All reported Whistleblower Incidents will be treated, to the greatest extent possible, in a confidential and sensitive manner. In addition, the Whistleblower shall be provided the opportunity to remain

anonymous, save and except in those circumstances where the nature of the disclosure and/or the resultant investigation make it necessary to disclose identity (for example, legal investigations or proceedings). In Canada there is currently little in the form of statutory protection for a Whistleblower and none to guarantee anonymity. In such cases, all reasonable steps shall be taken to protect the Whistleblower from detriment as a result of having made a disclosure.

- 3.10** The Corporation does not encourage anonymous reporting as proper investigation may prove impossible without the opportunity to substantiate allegations by obtaining further facts and information and confirming good faith. It also allows the Corporation to provide appropriate reporting and follow up.

#### **4. Documentation**

Relevant documents are expected to be held in confidence by all parties and participants under this Policy. Any official reports for the CEO or other designated parties shall be kept confidential by any recipient unless otherwise authorized by the report or the CEO. All relevant documentation including reports, discussions and supporting information in the direct or indirect control of the CEO shall remain in the control and custody of the CEO unless otherwise authorized pursuant to a report of decision issued in accordance with this Policy.

#### **5. Context**

As previously stated, this Policy is intended to encourage and enable current and former directors, employees, officers, consultants, agents, and partners of the Corporation to raise valid concerns of a Whistleblower Incident without fear of any form of retribution. The Corporation does not permit nor tolerate retaliation or harassment of any kind against an individual for complaints submitted hereunder that are made in good faith. A Whistleblower must however recognize that there are currently very few statutory protections of whistleblowers generally in Canada and none will guarantee anonymity.

Approved by the Board on October 14, 2021