

DIVERSITY POLICY

Blackwolf Copper and Gold Ltd. (the “**Company**”) is committed to creating and maintaining a culture of workplace diversity, inclusion, and innovation. Blackwolf believes that diversity promotes inclusion of different perspectives, ideas, encourages independent thinking and ensures that the Company benefits from all available talent. Heatherdale values the benefits that diversity and inclusion can bring to its Board of Directors (the “**Board**”), members of senior management and employees of the Company and its subsidiaries.

Blackwolf’s objective is to behave according to its values and founding vision, to be an industry leader in diversity and inclusion, and to foster a culture based on merit and free of conscious and unconscious bias. Blackwolf will strive to achieve:

- a diverse and skilled workforce at all levels of the Company reflective of the talent available in the areas the Company operates;
- a respective work environment where the Company’s employees honour differences in backgrounds, experiences and perspectives;
- engagement practices that value the perspectives of diverse stakeholders in the communities where the Company operates;
- investment in initiatives that reflect our commitment to diversity and inclusion;
- awareness in all personnel of their rights and responsibilities with regards to fairness, equity and respect for all aspects of diversity;
- zero tolerance for all forms of discrimination and harassment in our workplaces; and
- the maintenance of confidential and, if desired, anonymous mechanisms for the Company’s employees, contractors and external stakeholders to report actual or suspected incidents of unlawful discrimination and harassment without fear of retaliation or reprisal.

When assessing Board composition or identifying suitable candidates for appointment or re-election to the Board, the Company will consider candidates on merit against objective criteria having due regard to the benefits of diversity and the needs of the Board. When assessing the composition of the senior management team and workforce requirements, or identifying suitable management and workforce candidates, the Company will also consider candidates on merit against objective criteria having due regard to the benefits of diversity. The Company

will annually assess the expertise, experience, skills and backgrounds of its directors in light of the needs of the Board, including the extent to which the current composition of the Board reflects a diverse mix of knowledge, experience, skills and backgrounds, including an appropriate number of women directors.

Annually, the Governance and Nomination Committee of the Board will review this policy and assess its effectiveness in promoting diversity and inclusion.

APPROVAL OF THE POLICY

Reviewed and Adopted by the Board of Directors – January 18, 2021
Updated for name change – April 20, 2021