

**ROXGOLD INC.**

**HEALTH, SAFETY, ENVIRONMENT AND COMMUNITY POLICY**

**BASED ON**

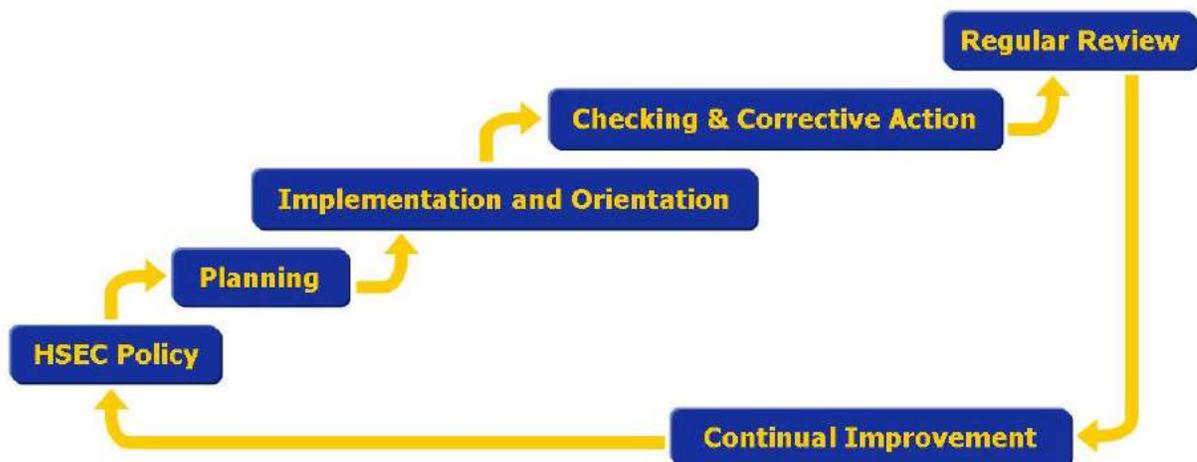
**International Best Practices, ISO 14001, OHSAS 18001, International Finance Corporation (IFC, World Bank) Performance Standards on Environmental and Social Sustainability**

Roxgold Inc. (“Roxgold” or the “Company”) and its subsidiaries are committed to the implementation of a comprehensive Health, Safety, Environment and Community policy (“the HSEC Policy”), to ensuring that this HSEC Policy is made known to all its managers, staff, contractors, and partners, and that it is proactively implemented, reviewed, and updated.

Roxgold Inc. is committed to achieving a safe, productive and healthy work environment and to creating sustainable value from both our resources and relationships. We will uphold the values of human rights and seek to create sustainable value for employees, business partners and the communities in which we operate. It is our fundamental policy to conduct our business responsibly and in a manner designed to protect our employees, host communities and the natural environment.

This Policy and its associated documents are aimed at ensuring that Roxgold and any subsidiaries involved in its operations adhere to the applicable best international practice Health, Safety, Environment and Community (HSEC) standards during all stages and all phases of exploration and development activities. In addition, Roxgold will ensure that the activities of direct Contractors and associates are in line with Roxgold policies and standards.

The figure below shows the elements involved in effective health, safety, environment and community management and is based on the Occupational Health and Safety Assessment Series and the international management system standards on environment (ISO 14000) and quality (ISO 9000) management, as well as the IFC Performance Standards on Environmental and Social Sustainability.



## HSEC Policy Overview

Roxgold Inc. and its subsidiaries are committed to proactive and sustainable health, safety, and environmental management and best practice community engagement strategies. Summarized policy statements from each of the relevant core areas are contained in this document.

In respect of the above the Company will:

- Work towards and build on international best practices for exploration and mining
- Implement environmental requirements as laid down by the authorities of Burkina Faso and any future jurisdictions in which it operates
- Implement health and safety best practices and making leadership accountable for their application
- Comply with IFC's Performance Standards and applicable guidelines
- Establish and implement appropriate communication and consultation procedures with all stakeholders, as identified in the Stakeholder Engagement Plan.

In striving to be a responsible corporate citizen, the Company seeks to conduct all activities in a way that is safe, environmentally responsible and respectful of both local laws and customs where we operate. Roxgold will ensure that wherever possible and necessary it assists in the development of sustainable local policies and procedures that will minimize the impact of exploration and mining activities on the natural landscape and local communities, and which will ensure a safe and healthy environment for the communities and natural resources, including wildlife, that may reside in the areas where exploration and possible subsequent mining may occur.

The above principles will also apply in respect of the approach to health and safety and fair working conditions for all employees and those individuals, communities and companies that may become involved with or affected by the planned exploration program, and all subsequent evaluation and mining programs.

Appropriate community liaison, disclosure and interaction will be undertaken at all stages by the Company, maximizing participation of local stakeholders in project activities and identifying opportunities for shared value where ever possible. The approaches and intensity of consultation and disclosure will grow and become increasingly tailored to stakeholders and stakeholder groups as necessary with the increased scale of activities as advised in the IFC's Performance Standards.

In addition to the policy statements presented below, all users of this material may refer to the ESHS Management Plans, Systems and Procedures created by the Company to govern its activities.

## Health and Safety Policy

Health and Safety is a core value of Roxgold ("The Company"). The Company is dedicated to ensuring the highest standards of health and safety for its employees and contractors. Protecting the health and safety of our workforce is a key commitment, our primary goal being to attain a Zero-Incident workplace, supported by a culture of safety leadership. Roxgold thus expects the full commitment and active participation of all employees and contractors in working towards this objective. All directors, officers and employees of the Corporation ("Personnel"), and contractors of the Corporation ("Contractors") are committed to the following:

- Complying with, and where possible exceeding the requirements of relevant laws, regulations and obligations relating to health and safety.
- All Personnel and Contractors are expected to be leaders in health and safety through safe and responsible behaviour, identification of hazards and the elimination and control of risk.
- Removing or reducing the risk to the health, safety and welfare of all Personnel, Contractors and visitors who may be affected by our business.
- Developing Health and Safety programmes which actively promote the reporting of all unsafe conditions and ensure that Personnel and Contractors follow all protective measures and undertake only safe and sustainable work practices.
- To working safely, Personnel and Contractors will be made aware of the hazards in the work place and the risk control strategies in place. This includes initial induction, ongoing and refresher training and specialized training.
- Consulting and co-operating with all Personnel to maximise each individual's involvement and responsibility in promoting a safety conscious work culture and maintaining safe systems of work and a healthy working environment.
- Monitoring health and safety performance through audits and workplace inspection to identify opportunities for continual improvement.

Roxgold will review and update its detailed procedures on Health and Safety, throughout the life of the project and operation to ensure that the procedures reflect the requirements of the project, its employees and contractors in order to meet the objectives of this policy stated above.

## Environmental Policy

As an Exploration and Mining company, Roxgold commits to conducting its activities in a responsible and lasting manner and will strive to maintain a balance between the environmental and socio-economic priorities of all aspects of its operations and of the communities impacted by its operations.

In order to achieve this the company will:

- Identify and monitor on an ongoing basis all the significant environmental aspects and impacts directly related to its activities and establish appropriate objectives and strategies to control and alleviate them;
- Endeavour to surpass all environmental norms and obligations applicable to its activities.
- Implement a recognized environmental management system that will allow the company to ensure that all environmental policies and procedures are integrated into all aspects of its activities and allow for the proper monitoring and continuous development of its policies and procedures;
- Allocate sufficient resources to meet the all of environmental objectives including the long term mine closure plan;
- Use best practices to prevent pollution, minimize sanitary and security risks and have a garbage management policy that will utilize the principles of usage reduction, reutilization, recycling, and elimination;
- Ensure that all employees, contractors, sub-contractors, suppliers, consultants and third parties contracted or associated with the development of the project understand their roles and responsibilities in the respect and management of the environment and encourage them to contribute to the management of the environmental issues;
- Have a high level of preparedness to react to environmental accidents in order to contain, control, clean up and eliminate;
- Have the upmost respect for the local cultures, values and traditions. Adopt an open communication policy regarding our activities with all related parties in order to achieve transparency in our socio environmental performance.

This policy is to be respected by the employees, the contractors, sub-contractors, consultants, suppliers, their employees and any third party contracted and, or associated with the project.

## Corporate Social Responsibility Policy

Roxgold (“The Company”) is committed to being a responsible corporate citizen and strives to follow best corporate governance practices in attaining our Social License to Operate. The Company seeks to achieve a balance of economic growth, social progress and environmental stewardship in our operations, embracing a Triple Bottom Line philosophy to ensure we make a lasting contribution in the communities in which we operate. We believe that Corporate Social Responsibility (CSR) should be an integral part of the operations of any business.

Roxgold’s vision is to create genuine value for our stakeholders and continually improve our sustainability performance, as a good corporate citizen and neighbour, sharing the benefits of responsible mining and ensuring that we leave a legacy of positive socio-economic and environmental impact in the areas in which operate. To this end, Roxgold is committed to:

- Ensuring that all employees participate in conducting our business in an honest, responsible and ethical manner, in compliance with all national legislation, international conventions, trade rules, ethical guidelines, regulations and rules that govern our operations, as outlined in Roxgold’s Code of Conduct;
- Integrating social considerations into all aspects of the Company’s business decisions and activities throughout all phases of the life of the project, taking into account and being responsive to the concerns, aspirations and values of our Project-Affected Communities, with a view to avoid or mitigate adverse social impacts and enhance any possible social benefits;
- Advocating Informed Consultation and Participation and meaningful two-way dialogue in all stakeholder engagement with Project-Affected Communities throughout LOM, with a view to securing Broad-based Community Support for Roxgold activities;
- Pursuing Free, Prior and Informed Consent from Project Affected Persons (PAPs) and community stakeholders in the evolution of company activities and the development of the Yaramoko mining project;
- Forming genuine partnerships with host communities, promoting inclusivity, sharing their environments and respecting their cultural heritage, traditions and values;
- Striving for positive social impact in the communities in which we operate, undertaking needs-based social investment initiatives within Project-Affected Communities as defined in our Corporate Social Investment policy, to support local socio-economic development in domains where we can make a practical and meaningful contribution, with emphasis on those that will be sustainable once our operations cease;
- Ensuring that informational materials about the Company and its operations shared with host communities are accurate and truthful to the best of employees’ knowledge and that the Company maintains accountability for this content;
- Contributing to the sustainable economic development of host communities by optimizing local employment, as outlined in the Company’s Local Recruitment policy;
- Continually finding ways to support local businesses where possible, to enhance the Company’s procurement of locally-sourced goods and services across its operations, as outlined in the Roxgold’s Local Content policy;
- Providing a workplace free of discrimination with regard to gender, race, religion, age, disability, sexual orientation, political opinion, social or ethnic origin, where all employees can fulfil their potential based on merit and ability and where the value of workplace diversity is recognized;
- Prioritizing high standards for occupational health and safety, thereby protecting the health and safety of all employees;

- Promoting sustainable, ethical and responsible sourcing and procurement management throughout its supply chains;
- Supporting and respecting the protection of internationally proclaimed human rights in the conduct of all activities and ensuring Roxgold is not complicit in human rights abuses;
- Environmental stewardship and the mitigation of potential adverse effects to biodiversity and the general environment in which we operate, through effective implementation of our Environmental and Social Management Plan;
- Fostering a culture of shared responsibility across all management positions, with regards to embodying the spirit of the Roxgold's Corporate Social Responsibility philosophy;

Roxgold takes these commitments seriously, and our management and Board of Directors will make every effort to foster a culture to support and honour them. All employees, officers, directors and other representatives of the Company are to understand that their actions and conduct must comply with this document and associated policies undertaken to further the Company's CSR objectives.

## Community Engagement Policy

As a socially-responsible corporate citizen, Roxgold believes that the creation and maintenance of a peaceful working environment and a positive working relationship with local stakeholders is of paramount importance in the sustainable achievement of its operational goals. The company is committed to comprehensive life-of-mine engagement with host communities and nurturing a congenial atmosphere in which to operate.

All employees, subsidiaries, suppliers, contractors, sub-contractors and consultants representing Roxgold, either directly or indirectly in the vicinity of the project, will demonstrate a commitment to the aims herein.

Roxgold is committed to:

- Developing effective working relationships with community members and will make every reasonable effort to work with these stakeholders to resolve issues that occur while carrying out its activities;
- Providing accurate and timely information to community stakeholders, consulting with them on operational activities that have an impact on the community and its well-being;
- Providing opportunities for local stakeholders to provide meaningful input into project management decision-making, with a view to building trust and achieving broad community support;
- Listening to and responding to the views and concerns of its neighbours in the Project-Affected communities;
- Contributing to the sustainable social and economic development of our host communities, through participatory social investment initiatives and the sharing of benefits associated with project operations;
- Respecting the rights, values and interests of Project-Affected Communities and Persons, in a manner consistent with the company's core values and policies, the United Nations Universal Declaration of Human Rights and the Voluntary Principles on Security and Human Rights;
- Using a variety of methods to engage local stakeholders, recognizing that tools and strategies must be tailored to suit the needs, norms, traditions and decision-making structures of host country stakeholder groups, with regards to receiving input on decisions, activities and processes the company seeks to engage on;
- Ensuring that there is an accessible, consistent Grievance Management mechanism which is transparent, involves communities, and has clear lines of accountability for following through on commitments made by properly designated representatives of the company;
- Assessing and addressing the potential impacts of its activities, both positive and negative, throughout the life of the project;
- Developing, implementing and maintaining management systems to identify, monitor and control existing and potential impact risks to the local community;
- Annually reviewing stakeholder engagement activity and periodically evaluating the effectiveness of the company's community engagement activities and strategies, with a view to continually improving engagement performance.

Roxgold's stakeholder engagement processes with host communities are guided by the following principles, which provide a basis for acceptable standards and good practices of community relations activities:

- **Inclusivity:** Roxgold will actively seek out a broad range of community stakeholders potentially affected by or interested in its processes and activities, and provide them with the opportunities and information they need to participate in a meaningful way.
- **Transparency:** Roxgold will clearly identify and explain the objectives of the engagement process, and the role of community stakeholders in the engagement process and subsequent decision-making processes.

- **Mutual learning and relationship development:** Roxgold will create opportunities for stakeholder engagement that emphasizes mutual learning outcomes and the development of collaborative relationships. Engagement approaches will welcome the sharing of diverse knowledge and values without prejudice or judgment.
- **Opportunity:** Roxgold will strive to ensure all community member groups have the opportunity to be informed about the project and that any responses, feedback or questions be heard and addressed.
- **Information sharing:** Company information must be shared in a format and language that is accessible and appropriate for our local stakeholders.

All employees, consultants and contractors are reminded to bear in mind at all times that they are ambassadors of Roxgold and guests in the host community. As such, they are expected to behave accordingly to represent a positive and neighbourly image of the company, with a view to strengthening the company's Social License to Operate. Any interactions of concern with host community members should be brought to the attention of the Community Relations department.

Any departments, consultants and contractors carrying out any activities with any social or environmental impact are requested to consult the Community Relations team beforehand, in a manner consistent with the Land Clearance and Disturbance Policy and Roxgold's Corporate Social Responsibility values, to ensure prior information disclosure, assessment of possible mitigation measures, evaluation of potential compensation needs and verification of the possible presence of any sacred sites or sites of archaeological importance located in the immediate vicinity of the planned work.



---

**John Dorward**  
**President and Chief Executive Officer**

*August 18<sup>th</sup>, 2015*