

## **RESPECTFUL WORKPLACE POLICY**

### **1. PURPOSE OF THIS POLICY**

NexGen Energy Ltd. ("NexGen" or the "Company") is committed to providing a respectful workplace where all people are treated with respect and dignity.

While all employees share a responsibility for promoting and maintaining a harassment and violence free workplace, we incorporate the responsibility for ensuring that our managerial practices comply with occupational health and safety and human rights legislation. We are committed to taking corrective action respecting any person under our direction who subjects another to harassment and or violence.

### **2. SCOPE AND APPLICATION**

This Policy applies generally to all of the Company's directors and officers and all employees, consultants, contractors and agents (each an "Employee"). In this Policy, these individuals are referred to as "you" or "your", and NexGen Energy Ltd. and our subsidiaries and affiliates, wherever located, are referred to as "NexGen", the "Company", "we", "our" or "us".

This policy applies to all activities that occur while on Company premises or while engaging in Company business, activities, or social events.

### **3. ASSURANCE OF FAIR TREATMENT AND OPEN-DOOR PRACTICE**

Every Employee has the right to a prompt and just resolution of problems and concerns through the Company's open-door practices. The Company promotes ongoing, open communication between employees and management.

Good communication is essential to the well-being of the Company since problems, questions, concerns, or complaints which are left unresolved negatively impact our work and our environment. Any Employee who has a question, concern or suggestion of any kind is encouraged to bring it to the attention of management immediately.

#### **Process**

- I. This practice will be reviewed with new Employees during onboarding and it will be posted on employee communication boards and the Company intranet.
- II. If an Employee has a concern or problem in the workplace, he or she is encouraged to talk openly about it to their immediate supervisor or manager. All Employee concerns and problems will be handled without delay in confidential and fair manner.
- III. Employees should first discuss the situation with their immediate supervisor or manager. The immediate supervisor or manager will be most familiar with the employee and the job requirements. However, if the situation involves the supervisor or manager or if the Employee is not satisfied with the supervisor's or manager's response, or if, for any reason, the Employee does not wish to bring the problem to the supervisor's or manager's attention, he or she may present the concern directly to the Vice President, Human Resources.



- IV. If the problem is still not resolved to the Employee's satisfaction, he or she may speak with or write to the Chief Executive Officer of the Company.
- V. No Employee shall suffer retaliation or other negative consequences for raising legitimate workplace concerns or problems with the Company pursuant to this policy.

## 4. HARASSMENT & VIOLENCE

### Definition and examples of Harassment

**Harassment** refers to:

Discriminatory Harassment - Any inappropriate conduct, comment, display, action or gesture by an individual that is made on the basis of race, creed, religion, colour, sex, sexual orientation, marital status, family status, disability, physical size or weight, age, nationality, ancestry or place of origin or any other ground prohibited by provincial human rights legislation.

Sexual Harassment - A prohibited ground of discriminatory harassment which may include conduct, comment, gesture or contact of a sexual nature that is offensive, unsolicited or unwelcome.

Personal Harassment - An inappropriate conduct, comment, display, action or gesture by an individual that adversely affects another's psychological or physical well-being, and which the alleged harasser knows or ought to reasonably know would cause the individual to be humiliated or intimidated. Personal harassment is sometimes referred to as "bullying". Personal harassment may involve repeated conduct or a single, serious incident.

**Examples of harassment** include, but are not limited to:

- Using offensive nicknames, telling offensive jokes or making inappropriate innuendoes;
- Racist language, slurs, derogatory comments, and stereotypes;
- Displaying lewd or offensive photographs or drawings;
- Suggesting that sexual activities would affect one's job, promotion, performance evaluation or working conditions, particularly when the suggestions are made by a person in a position to confer a benefit on the individual in question where the person making the solicitation knows or ought reasonably to know that it is unwelcome; and/or
- Other conduct that, even if not objectionable to some, creates a working environment that may be considered by others to be hostile or offensive.

### What is not harassment?

Harassment does not include any reasonable actions taken by NexGen, a manager or a supervisor relating to the performance, management and direction of an individual's work or the workplace.

Managing, counseling, coaching, performance appraisal, work assignment and implementation of disciplinary action are not harassment, and this policy does not restrict manager and/or supervisor responsibility in these areas.

### Definition and examples of Workplace Violence

For the purposes of this policy, "workplace violence" means the attempted, threatened or actual conduct of a person that causes or is likely to cause injury, and includes any threatening statement or behavior that gives a person reasonable cause to believe that they are at risk of injury where the action is work related or at a work site.



**Examples of workplace violence** include, but are not limited to:

- a) Threatening behavior such as shaking fists, destroying property or throwing objects;
- b) Verbal or written threats that express intent to inflict harm;
- c) Physical attacks; and
- d) Any other act that would arouse fear in a reasonable person in the circumstance.

#### **Prohibited Conduct**

No Employee or any other individual affiliated with this Company shall subject any other person to workplace violence or create conditions that support workplace violence.

An Employee of the Company that subjects another Employee or any other individual affiliated with this Company to workplace violence may be subject to disciplinary action commensurate to the incident, up to and including dismissal or termination of contract or consulting arrangement.

## **5. RESPONSIBILITIES**

We are responsible for fostering a respectful work environment and setting an example of appropriate workplace behaviour. We will take all allegations of harassment and violence seriously. We are committed to implementing a harassment and violence free work environment and will make every reasonably practical effort to ensure that no individual is subject to harassment or violence.

#### **Our Responsibility:**

- Providing an environment that is free from harassment and workplace violence;
- Communicating the nature and extent of any risk of harassment or workplace violence as required;
- Ensuring that this Policy is communicated effectively;
- Identifying training needs for employees and providing a training program;
- Ensuring that our people understand who to contact regarding concerns about the policy or when reporting an incident;
- Ensuring our own immediate physical safety if an incident of workplace violence occurs;
- The appropriate level in the Company would report the criminal behavior to the applicable law enforcement agency; and
- Recommending that anyone who has experienced harassment or has been exposed to a violent incident consult with a physician for treatment or be referred to the employment assistance program for post incident counseling.

#### **Your Responsibility:**

- We expect that you will not participate in or encourage harassment or a violent act towards another individual;
- Refraining from all acts of workplace harassment and violence and acting respectfully towards other individuals while at work or while participating in any work-related activity;
- Reporting acts of workplace harassment or violence to a supervisor/manager as soon as possible to ensure your own safety and the safety of others and to facilitate that appropriate and timely action is taken; and
- Respect confidentiality and co-operate, with any efforts to investigate and resolve complaints of workplace harassment and violence arising under this policy.

#### **You can expect:**

- To be treated with respect in the workplace;



- That reported harassment or act of violence will be dealt with in a timely, confidential and effective manner;
- To have a right to a fair process and, to the extent the Company may reasonably do so, to have confidentiality respected during an investigation; and
- To be protected against retaliation for reporting alleged harassment, an act of violence or cooperating with an investigation.

## **6. PROCEDURE - REPORTING ALLEGED INCIDENTS OR CONCERNS**

### **Informal process - Harassment**

If you feel that you are subject to conduct that you consider is harassment, you are encouraged, where appropriate, to make it known to the individual who is engaging in such conduct that the conduct is unwelcome and should cease. You can do this verbally or in writing and record the individual's response.

### **Formal process - Harassment**

Where the informal process is unsuccessful, or you are not comfortable addressing the issue directly, you should document the details of the alleged harassment (including name(s) of the alleged harasser(s), date, time(s), place(s), particulars of the alleged harassing event(s), and name(s) of witness(es), if any) and submit a written report to the following person designated to receive allegations of harassment:

Gillian McCombie  
Vice President, Human Resources  
Email: [gmccombe@nxe-energy.ca](mailto:gmccombe@nxe-energy.ca)  
Telephone: 604-259-5986 Extension: 205

### **Procedure – Reporting of Violent Incidents**

We all have a responsibility to assist in providing a safe workplace. In order to achieve this, you are responsible for promptly communicating issues relating to the risk of workplace violence.

- i. In the event that you witness an act of workplace violence, or are directly affected by an act of workplace violence, you must promptly report the incident to the VP, Human Resources, a supervisor or manager.
- ii. You may choose to file a formal written complaint respecting an act or acts of workplace violence with Human Resources. You may ask for support from Human Resources, or a supervisor or manager, to communicate your complaint respecting an incident or incidents of workplace violence and/or to prepare and submit a formal written complaint.
- iii. In a formal complaint, you should carefully record details of the incident including the date and time of the incident, the person(s) involved, nature of the violence, and names of people who may have witnessed the incident as soon as possible to ensure details are noted fully and accurately.

You will not be penalized or reprimanded when acting in good faith while following this Policy and the supporting procedures. This Policy does not discourage or prevent you from exercising your legal rights, actions or remedies under any law, including but not limited to human rights legislation.

The incident may be reported externally as well, where appropriate, to the appropriate provincial body or law enforcement authorities. For greater certainty, this refers to the applicable provincial body in the Province in which you work which may include, but is not limited to, the Occupational Health and Safety Division (Saskatchewan).



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### **Investigation of Formal Complaints**

When the written report is received, this Policy and the Procedures contained herein will be reviewed with the complainant before proceeding. Upon confirming the complainant's report, the alleged perpetrator will be notified and provided with information concerning the circumstances of the report. If there is sufficient basis in the written report or if we otherwise deem it necessary to do so, an investigation into the conduct contained in the report will be commenced. Where appropriate, and at our discretion, an external and/or independent investigator may be appointed.

Where harassment or an act of violence is substantiated, we will take appropriate corrective action and/or disciplinary action, up to and including termination of employment, contract or consulting arrangement. Where appropriate, we may also report the matter to law enforcement authorities.

Where harassment or an act of violence is not substantiated, no action will be taken against an individual who made the allegation of harassment in good faith.

Where, however, an allegation of harassment or act of violence is found to have been fraudulent, malicious, vexatious, demonstrates collusion or otherwise is made in bad faith, the individual who made the allegation of harassment or act of violence may be subject to disciplinary or other action, up to and including dismissal or termination of contract or consulting arrangement.

### **Duty to Cooperate**

You have a duty to cooperate in an investigation, maintaining obligations of confidentiality. If you fail to cooperate or provide false information in an investigation, the Company will take effective remedial action commensurate with the severity of the offence.

The Company expects all Personnel to treat matters arising under this Policy with appropriate concern for the confidentiality of both the process under this Policy and the Company information which may form the subject matter of any report under this Policy.

### **Documentation**

All written reports, response statements, witness statements, interview notes and other documentation gathered as part of an investigation will be securely stored in a confidential investigation file.

### **Confidentiality**

We will not disclose the name of an individual bringing forward an allegation of harassment or an alleged harasser or the circumstances related to the allegation of harassment except where disclosure is necessary for the purposes of investigating the allegation of harassment or pursuing corrective action, or where such disclosure is required by law.

All parties to any complaint or investigation under this policy will be expected to respect the confidentiality of the process. Failure to respect confidentiality may lead to disciplinary or other action, up to and including dismissal or termination of contract or consulting arrangement.

### **Temporary or Interim Measures**

In the event of an allegation of harassment or act of violence, we have full discretion to take whatever temporary interim measures that we deem appropriate to ensure the workplace remains a safe and productive environment and/or helps to facilitate an investigation into said harassment or violent act including, but not limited to, removing an individual from the workplace.

### **Variation from the General Process**

The steps set out above and the manner in which an investigation is carried out is intended to be flexible in order to permit us to respond to the specific circumstances and sensitiveness at issue in each case. We



reserve the right to engage in a different procedure as we deem appropriate in any given circumstance. In the event that an individual does not proceed with a formal report of harassment or decides to later withdraw a written report, we may still initiate a formal investigation of the conduct reported if we determine it is necessary to ensure the health and safety of persons at the workplace or to comply with applicable laws.

### **Reprisal Prohibited**

All persons involved in the processing of a complaint will ensure that the complainant is neither penalized nor subjected to any prejudicial treatment as a result of making the complaint. Disciplinary action will be taken against any person who takes any reprisal against a person who files a report of harassment.

### **False Accusations – Intentional Breach of Policy**

Where harassment or an act of violence is not substantiated, no action will be taken against an individual who made the allegation of harassment in good faith.

If an investigation results in a finding that the complainant falsely accused an individual of workplace harassment or violence knowingly or in a malicious manner or otherwise breached or abused this policy, the complainant will be subject to appropriate investigation and, if warranted, disciplinary sanctions, including the possibility of termination. Such action is considered a violation of this Policy, and the investigation results and any sanctions will be recorded in our HR records relating to the complainant.

### **Consequences of Non-Compliance**

Compliance with this Policy is a condition of your employment. Policy violations may result in severe consequences, which could include dismissal or termination of contract or consulting arrangement.

### **Other Options**

Nothing in this policy precludes you from exercising any other legal rights pursuant to any other law in the province where you work including referring an allegation of harassment to the Occupational Health and Safety Division, including under the following:

- *The Saskatchewan Employment Act*, section 3-1(1)(l); and *The Occupational Health and Safety Regulations, 1996*; particularly section 36(1), if you work in Saskatchewan; or
- *The Workers' Compensation Act* and the *Occupational Health and Safety Regulation* if the you work in British Columbia.

You may also file a complaint with the applicable provincial human rights body, which includes the Saskatchewan Human Rights Commission and the British Columbia Human Rights Tribunal.

### **Revisions**

We shall ensure that this Policy is reviewed and, where necessary, revised at least every three years. A review will also be done whenever there is a change of circumstances that may affect the health or safety of employees.