



## GRIEVANCE PROCEDURE

**Effective Date: February 23, 2021  
(as updated December 12, 2021)**

### INTRODUCTION

B2Gold Corp. (the “**Company**”, and together with its subsidiaries, the “**B2Gold Group**”) promotes fairness, respect, transparency and accountability as central values to the way it conducts its business and therefore also how it treats every director, officer, employee, consultant and contractor of the B2Gold Group (collectively, the “**B2Gold Personnel**”).

The Grievance Procedure is established to provide all B2Gold Personnel with an effective, well-known and accessible procedure to raise workplace complaints and grievances, including Discrimination and Harassment (as such terms are defined in the Company’s Non-Discrimination and Harassment Policy) issues.

This Procedure is to be read in conjunction with the Company’s Code of Business Conduct and Ethics, People Management Policy, Diversity Policy, Equitable, Diverse and Inclusive Workplaces Policy, Non-Discrimination and Harassment Policy and Supplier Code of Conduct.

### SCOPE

This Procedure applies to all B2Gold Personnel.

### PURPOSE

The Grievance Procedure is designed to:

- Describe effective procedures to provide, complement or enhance any existing codes of conduct for complaints or grievances to be received, investigated and responded to in a sensitive, fair, timely, confidential and appropriate manner;
- Respond to complaints before it escalates into serious grievances. The intention of the Company and all B2Gold Personnel must be to resolve complaints at the earliest stage possible and as speedily as possible;
- Be accessible to, and understood by all B2Gold Personnel;
- Ensure protection from any victimization or retaliation; and
- Provide guidance for all B2Gold Personnel and any instances where a regional grievance mechanism does not exist.

The Procedure will not replace the authority of management to ensure workplace safety and maintain order and discipline.

### RESPONSIBILITIES

All B2Gold Personnel must:

- Familiarize themselves with this Procedure;
- Report complaints and grievances in good faith. B2Gold Personnel may lodge valid, authentic grievances



without any prejudice whatsoever to their employment. Grievances should however not be of a malicious nature and should be raised to improve workplace relations and not to cause any disruptions. A complaint that is malicious, false or frivolous may result in disciplinary measures against the person who made the complaint or reported the incident;

- Not retaliate in any way to any reporting, disclosure, discipline or associated actions, internally or externally.
- The Human Resources Department must ensure that the Procedure is accessible to B2Gold Personnel, that grievances are followed up, documented and reported to the SVP, and will as far as possible aim to ensure that confidentiality is respected throughout the process.

### INFORMAL RESOLUTION

In many cases, the situation or complaint can be resolved informally. An informal approach offers the opportunity to resolve a complaint in a non-threatening and non-contentious manner. Aggrieved individuals are encouraged to notify the Offender of their complaint and ask them to stop the offending behaviour as, in some instances, the alleged Offender may not be aware that their behavior is offensive.

Disparity in power or status or other considerations may make direct confrontation difficult. Aggrieved individuals are not required to confront the Offender and may ask for assistance from the direct manager or another person of authority for advice and assistance to act in consultation with the aggrieved individual in dealing with the situation informally and in confidence, with a view to resolving concerns promptly. Often the matter can be resolved informally by a person of authority approaching the alleged Offender and making clear that the conduct is not acceptable.

### SUBMITTING A GRIEVANCE

In circumstances where informal resolution is not desired or appropriate, or has been unsuccessful, the aggrieved individual may submit a written grievance as set out in this Procedure or the specific region's grievance procedure.

- *The Aggrieved* must submit a grievance to the manager a level above the alleged Offender and a copy provided to the HR Manager/Director for monitoring purposes. In all instances of Discrimination or Harassment, aggrieved individuals or witnesses may report circumstances directly to the HR Manager/Director without the need to obtain authorization or clearance from management. If the grievance involves the HR Manager/Director, the grievance should be directed to a level above.
- Following the submission of a report *by a direct witness* to one of the officials listed above, formal procedures may be initiated without the incident being reported by the Aggrieved.
- In the event of *HR or Senior Management* becoming aware of a possible situation or incident, it may be investigated without a direct claim by the Aggrieved or Victim.
- Where *no regional grievance* mechanism is in place, the aggrieved individual may submit a written grievance to their manager.
- Where the Aggrieved or Victim is an *employee of a contractor*, they should report the incident to their employer, who must in turn inform the Company. An appropriate process will then be established to address the matter.

The grievance or report should describe the alleged incident(s) of prohibited conduct in detail and any additional



evidence and information relevant to the matter should be submitted. While this may initially be a verbal statement, a written report must be submitted detailing:

- The name of the alleged Offender
- Date(s) and location(s) of incident(s)
- Description of incident(s)
- Names of Witnesses, if any
- Any other relevant information, including documentary evidence if available
- Date of submission and signature of the Aggrieved or Witness.

This Procedure can be used to address all forms of workplace concerns and grievances and it can be done anonymously. In case of a grievance or an incident that relates to Discrimination or Harassment however, it is imperative for a very select number of people to know the identity of the Aggrieved since thorough investigation is required and, following the formal process, a continuing engagement is necessary to ensure that corrective actions have been implemented successfully and that no further action or counseling is required.

Upon receipt of a grievance, Management may seek to resolve the situation by way of mediation between the Aggrieved and the Respondent. This is not compulsory and will only occur if the Aggrieved is willing to do so. The Aggrieved can have another B2Gold Personnel attend the mediation meeting for emotional support; the support person will play no part in the mediation. If mediation is unsuccessful or not acceptable to the Aggrieved, the complaint will be formally investigated.

#### **FORMAL PROCEDURE TO ADDRESS GRIEVANCES**

*The timelines (indicated as working days) below are indicative and will depend on the nature of grievance. Exceptions to the timeline may apply where either the Aggrieved or the alleged Offender is implicated or involved in another ongoing disciplinary or grievance process.*

*In case of Discrimination or Harassment grievances, the Aggrieved may request assistance from a colleague to support them during the process.*





## DEFINITIONS

**“Complaints”** are any general dissatisfaction affecting a B2Gold Personnel which arises out of their work situation, and not out of a violation. Complaints should be resolved informally between the B2Gold Personnel and the appropriate manager.

**“Grievances”** are violations of the B2Gold Personnel’s right in the workplace, the employment or engagement contract or the law.

**“Good Faith”** means a sincere belief or motive without any malicious intent.

**“Mediation”** is a facilitation process whereby a neutral third party assists two B2Gold Personnel to come to an agreement.

**“Retaliation”** occurs when any B2Gold Personnel is punished as a result of reporting a complaint or for participating in an investigation.

**“The Aggrieved / Victim”** is a B2Gold Personnel who believes that they have experienced inappropriate conduct of a discriminatory or harassing nature, can be of any gender / gender identity, the same or different from the Respondent.

**“The Respondent / (Alleged) Offender”** is the person against whom an allegation has been made under this Policy and can be a supervisor, co-worker, internal or external stakeholder, vendor or visitor.

**“The Witness”** is a B2Gold Personnel or individual who has direct knowledge (directly witnessed) of the conduct between the Respondent and the Aggrieved.

## CONFIDENTIALITY

**The privacy of both the Aggrieved and Respondent will be respected throughout the process, by ensuring only those identified as required will be informed and involved. The Company is committed to protection of unauthorized disclosure of personal information regarding the parties involved in any complaint or grievance. Information collected and compiled through the investigative process will be protected in accordance with confidentiality policies and all privacy regulations in force.**

## REVIEW AND AMENDMENT

This Policy will be reviewed every year. Amendments to local regulations and Human Rights legislation which exceed any part of this Policy, will be complied with. All employees of the Company and its subsidiaries and any other party as determined by the Company will receive and be trained on this procedure.

## APPROVAL

B2Gold Corp. President and Chief Executive Officer