

Workplace Bullying and Harassment Policy Statement

(the “**Policy**”)

— INTRODUCTION

Sandstorm Gold Ltd. (the “**Company**”) is committed to creating and maintaining a workplace environment free of discrimination and harassment (as defined below) which fosters mutual respect, integrity and professional conduct. In keeping with this commitment, the Company has established this Policy and a set of reporting/investigation procedures (the “**Reporting/Investigation Procedures**”) for all employees relating to the issue of workplace bullying and harassment. This Policy specifically prohibits any form of harassment or violence by or towards employees, contractors, suppliers and clients. The Company will not tolerate bullying or harassment in the workplace and will make every reasonable effort to prevent and eliminate conduct which falls within the scope of this Policy.

— APPLICATION AND SCOPE

All Company employees, contractors, Directors and officers are covered by this Policy. This Policy applies to all activities which take place on the Company’s premises (including interpersonal and electronic communications), or which are directly connected to the workplace and during any employment-related duties or activities, including conferences, training sessions, travel and social functions.

— DEFINING WORKPLACE BULLYING AND HARASSMENT

Each employee, officer and director is expected to treat all other employees, officers and directors with professional courtesy, dignity and respect and in a fair and non-discriminatory manner in all employment or Company related dealings.

Employees, officers and directors shall not subject any other employee, officers or directors to:

- i Discrimination because of race, colour, religion, gender, gender identity, gender expression, sexual orientation, family or marital status, political belief, age, national or ethnic origin, citizenship or physical disability and any other protected ground;
- ii Any form of harassment, which includes any conduct or comment directed at any other employee, officer, or director that will cause humiliation or intimidation, including verbal aggression, insults or bullying, but which excludes reasonable action relating to the management or direction of the Company’s workplace; or
- iii Sexual harassment, unwelcome sexual advances, requests for sexual favours or other verbal or physical conduct which might be construed as sexual in nature.

Any discrimination, harassment or threat or act of violence on the basis of the above grounds for discrimination or otherwise is clearly unacceptable and will not be tolerated. Everyone is expected to uphold this Policy and to work together to prevent discrimination, harassment and workplace violence.

— REPORTING/INVESTIGATION PROCEDURES

- A** Sandstorm personnel are encouraged to speak with their immediate supervisor, when any person's conduct, including that of a co-worker, makes them uncomfortable.
- B** Individuals who believe that they have been subjected to discrimination, harassment or a threat of or an act of violence should make a formal complaint in writing to their immediate supervisor, or, if preferred, to the Disclosure Committee, or, if necessary, to the Chairman of the Audit Committee. The formal complaint should be confined to the precise details of the actual incidents of bullying/harassment (i.e. the names of the parties involved, any witnesses to the incident(s), the location, date and time of the incident(s), details about the incident(s) including the behavior and/or words used which led to the complaint, and any additional details which would assist with an investigation).
- C** Complaints, whether made orally or in writing, will be promptly and thoroughly considered and if appropriate investigated by the Disclosure Committee (or delegate). Sandstorm will treat such complaints as confidentially as possible, releasing information only to those with a need or right to know.
- D** If a claim of discrimination, harassment or violence is proven against an individual, disciplinary measures will be applied, up to and including termination of employment or contractor arrangements. In the case of harassment or violence, victims will be provided with appropriate employee assistance programs, if available.

— EMPLOYEES' RIGHTS, ROLES AND RESPONSIBILITIES

Each and every employee of the Company is expected to support the implementation of this Policy by:

- ▶ conducting themselves in a manner which demonstrates professional conduct, mutual respect for others and which honours diversity in the workplace;
- ▶ not engaging in the bullying and harassment of others;
- ▶ participating fully and in good faith in any resolution process or formal complaint and investigation process where they have been identified as having potentially relevant information;
- ▶ reporting any bullying and harassing behaviours which they experience or observe in the workplace which may be in violation of this Policy; and
- ▶ respecting the rights to personal dignity, privacy and confidentiality pertaining to this Policy.

— MANAGEMENT ROLES AND RESPONSIBILITIES

While every employee is responsible for maintaining and contributing to an environment which is free from bullying, those in positions of authority over staff carry more responsibility than other employees within the Company's organization. Management personnel have additional obligations to make every reasonable effort to establish and maintain a workplace free of bullying or harassment. Related to this Policy, their responsibilities include but are not limited to:

- ▶ ensuring that employees have full access to information regarding employer policies and standards;
- ▶ respecting the rights of all parties to a fair, equitable and confidential process for responding to complaints;
- ▶ providing support to all those who participate in a problem-solving process; and
- ▶ enforcement of corrective and/or disciplinary measures, where applicable.

— ANNUAL REVIEW AND RELATED MATTERS

This Policy and the Reporting/Investigation Procedures which apply to it will be reviewed annually by the Company's Disclosure Committee and any changes to this Policy and the related Reporting/Investigation Procedures will be communicated to all persons to whom this Policy applies.

Employees will be provided with a copy of this Policy and the related Reporting/Investigation Procedures and are required to acknowledge that they have read this Policy when they are engaged or when this Policy and the related Reporting/Investigation Procedures are introduced or significantly revised.

IMPLEMENTED by the Disclosure Committee of **SANDSTORM GOLD LTD.** on November 1, 2013.

AMENDED AND APPROVED by the Board of Directors of **SANDSTORM GOLD LTD.** on August 1, 2024.