

## 1. Introduction

1.1. Denison Mines Corp. and each of its subsidiaries (“Denison”) recognizes the dignity and worth of each of its employees and contractors and to that end believes in providing and maintaining a work environment free from workplace violence, harassment, sexual harassment and discrimination. Such actions will not be tolerated and, where possible, will be addressed accordingly.

1.2. Under the provisions of applicable federal and provincial regulations, including: (i) in Ontario, Part III of the Occupational Health and Safety Act, and (ii) in Saskatchewan, sections 3-6 of the Saskatchewan Occupational Health and Safety Act, 1993, sections 36 and 37 of The Occupational Health and Safety Regulations, 1996, section 3 of The Saskatchewan Employment Act and the applicable provisions of The Saskatchewan Human Rights Code (collectively, the “Regulations”), every employee has the right to freedom from harassment in the workplace.

1.3. Denison fully supports and adheres to the principles and practices set out in the Regulations and will make every reasonably practicable effort to ensure that its employees are free from workplace violence and harassment. For the purposes of this Policy, the term “employees” includes Denison’s contractors.

## 2. Prohibited Conduct

2.1. All employees, including managers and supervisors employed by Denison, are responsible for conducting themselves in a manner consistent with this Policy and shall refrain from causing or participating in workplace violence and/or the harassment of another employee, and co-operate with any person investigating harassment complaints.

2.2. For the purposes hereof, “harassment” means:

- a. engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome, including any inappropriate conduct, comment, display, action or gesture by a person that constitutes a threat to the health and safety of an employee, that:
  - i. 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
  - ii. adversely affects the worker's psychological or physical well-being and that the person knows or ought reasonably know would cause a worker to be humiliated or intimidated; and/or
- b. workplace sexual harassment, which is defined to mean (a) engaging in a course of vexatious conduct, comment, display, action or gesture against a worker in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome, or (b) making a sexual solicitation or advance where the person making the solicitation or advance is in a position to

confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

2.3. Examples of harassment in the workplace include, but are not limited to:

- unwelcome words or action that are known or should be known to be offensive, embarrassing, humiliating or demeaning, including but not limited to remarks or jokes about a person's body, attire, or gender;
- behavior that intimidates, isolates or discriminates against a targeted individual;
- serious or repeated rude, degrading or offensive remarks, such as teasing, put-downs or insults, bullying, malicious gossip, intimidating or offensive jokes or innuendoes;
- displaying or circulating offensive pictures or materials or offensive or intimidating telephone calls;
- refusing to converse or work with an employee because of his or her racial, ethnic background or any other protected personal characteristic;
- threats, intimidation or retaliation;
- leering (suggestive staring) or unwelcome physical contact of any sort; or
- unwelcome sexual solicitation or advances and reprisals or threats of reprisal for the rejection of a sexual solicitation or advance.

2.4. The harassment must involve either repeated occurrence or a single, serious occurrence that has reasonably been established to have caused a lasting harmful effect on a worker.

2.5. For the purposes hereof, in accordance with the Regulations, "workplace violence" means:

- a. the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker,
- b. an attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker, or
- c. a statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

2.6. Harassment or violence which occurs outside the workplace or outside regular business hours, but which has repercussions in the workplace, may also be a violation of this Policy. This includes communications by e-mail or text message or social media, whether or not such communications are made using Denison's information technology system.

2.7. Reasonable actions or conduct by management that is part of the running of the business will not be considered harassment or workplace violence. This is the case even if there are unpleasant consequences for an employee, such as negative performance reviews or changes in work assignments. Differences of opinion or minor

disagreements between employees will similarly not be considered workplace violence or harassment.

### 3. Complaint Procedure

3.1. An employee who believes that he or she has been subjected to or has observed harassment or workplace violence is requested to report the incident to Denison in any of the following ways:

- a. to their immediate supervisor; and/or
- b. to Denison's Director, Human Resources (currently Mary Jo Smith, 416-979-1991 ext 241, [msmith@denisonmines.com](mailto:msmith@denisonmines.com)); and/or
- c. to Denison's Vice President Legal & Corporate Secretary (currently Amanda Willett, 416-979-1991 ext 225, [awillett@denisonmines.com](mailto:awillett@denisonmines.com)); and/or
- d. in accordance with Denison's Whistleblower Policy, which can be found on Denison's website at [www.denisonmines.com](http://www.denisonmines.com), including reporting through the secure online portal at [www.integritycounts.ca/org/denisonmines](http://www.integritycounts.ca/org/denisonmines).

3.2. If the incident is initially reported verbally, in one of the methods listed in (a), (b) or (c) above, a formal written incident report will also need to be prepared and submitted by the complainant, with a copy to be forwarded to Denison's Director, Human Resources. The complainant may seek the assistance of their supervisor, Denison's Director, Human Resources and/or Denison's Vice President Legal & Corporate Secretary in preparing the incident report.

3.3. Any incident report is to include, at a minimum, the nature of the allegations; the names of the persons involved; the relationship of the persons involved (e.g., supervisor, colleague); the date and a detailed description of the incident(s); and, if applicable, the names of witnesses. The onus is on the complainant to provide sufficient information (including any relevant supporting documentation), and be as precise and concise as possible.

3.4. **A formal written incident report is to be submitted in accordance with sections 3.1 and 3.2 within 12 months of incident** (or initial incident, in the case of a repeated act or occurrence), and complainants are strongly encouraged to report any incidents as soon as practicable, as that will greatly assist the investigation.

3.5. Once a formal written incident report has been submitted in accordance with sections 3.1 and 3.2 above, investigations will be conducted by Denison's Director, Human Resources or Vice President Legal & Corporate Secretary (or such other person as the Chair of the Audit Committee designates). Investigations will be conducted in a timely manner, will be documented, and will be focused on finding facts and evidence, including interviews of the complainant, respondent and any witnesses or other persons known to be directly involved that are still employees of Denison or otherwise willing to cooperate with Denison's efforts to investigate.

3.6. All employees of Denison are expected to cooperate fully in any investigation.

3.7. To the extent practicable and appropriate under the circumstances, confidentiality will be maintained throughout the complaint, investigatory and disciplinary processes, in order to protect the interests of the complainant and the respondent. However, disclosure of information collected in the course of an investigation may be necessary for a proper investigation and resolution of the matter, or otherwise deemed necessary in the circumstances or otherwise required by law and as a result, confidentiality cannot be guaranteed.

3.8. Results of an investigation will be communicated to both the complainant and respondent as soon as possible after the investigation has been completed.

3.9. Based upon results of the inquiry and within a reasonable period of time, action and/or disciplinary measures which management feels appropriate will be taken (up to and including termination of employment).

3.10. Retaliation or reprisals are prohibited against any individual who has complained under this policy, or has provided information regarding a complaint. Any retaliation or reprisals are subject to immediate corrective action, up to and including termination of employment. Alleged retaliation or reprisals are subject to the same complaint procedures and penalties as complaints of harassment.

3.11. If it is concluded that a complaint has not been substantiated and (i) there have been a series of unsubstantiated complaints, or (ii) a complaint has been found to have been made by the complainant falsely and maliciously, the complainant may be subject to disciplinary action up to and including termination of employment.

#### 4. Other Options for Complaints

4.1. **If there is an emergency occurring in the workplace, call 911 immediately.**

4.2. Nothing in this policy prevents or discourages an employee from referring a harassment complaint: (i) in Ontario, to the applicable Ministry of Labour Health & Safety Centre in Ontario or the Ontario Human Rights Commission, (ii) in Saskatchewan, to the Occupational Health and Safety Division of Labour Relations and Workplace Safety Saskatchewan or the Saskatchewan Human Rights Commission, or (iii) the applicable body or commission in the employee's province. An employee also retains the right to exercise any other legal avenues available.

#### 5. Denison's Commitment

5.1. Denison will treat any complaint of workplace violence or harassment as a serious matter. All complaints of workplace violence or harassment will be investigated and handled in a confidential manner (to the extent possible and subject to the requirements of law).

5.2. Denison expects every employee to comply with this Policy and the supporting measures and procedures. All employees are encouraged to raise any concerns about workplace violence and harassment and to report any possible violations of this Policy. If an employee has questions or concerns regarding this Policy, or if they have



suggestions regarding how to eliminate risks of workplace violence and harassment, please contact Denison's Vice President Legal & Corporate Secretary.

## 6. Policy Review

6.1. This Policy has been approved by the President and Chief Executive Officer and will be reviewed and ratified at least annually by the Board of Directors, or appropriate Committee, of Denison Mines Corp.

6.2. This Policy will be distributed annually to Denison's employees and will be posted in a conspicuous place that is readily available to all employees.

*Reviewed annually by the Corporate Governance & Nominating Committee.*

*Last amended by approval of the Corporate Governance & Nominating Committee on November 16, 2020.*