



Modern Slavery Statement

About this Statement

Kirkland Lake Gold Ltd. (“KLG”) is a Canadian public company listed on the Toronto Stock Exchange, New York Stock Exchange, and Australian Stock Exchange (TSX: KL, NYSE: KL, ASX: KLA). The Company conducts its business in Australia through its wholly-owned subsidiaries: Kirkland Lake Gold Australia Pty Ltd. (“KLG A”) (ACN 136 505 587), NT Mining Operations Pty Ltd. (“NTMO”)(ACN 136 525 990), Kirkland Lake Gold Victorian Holdings Pty Ltd. (“KLG V H”)(ACN 128 442 375) and Fosterville Gold Mine Pty Ltd. (“FGM”)(ACN 010 604 878).

The terms “the Company”, “KL Gold”, “our”, and “we” are used throughout this report refer to KLG, KLG A, NTMO, KLG V H and FGM collectively. These terms are used for convenience only and are not intended to convey how we are structured, managed or controlled. The Company has a registered office address at 200 Bay Street, Suite 2800, Toronto, Ontario, Canada with its wholly-owned subsidiary, KLG A having a registered office address at Level 33, 101 Collins Street, Melbourne, Victoria, Australia 3000.

This statement is filed on behalf of all of KLG, KLG A, NTMO, KLG V H and FGM in accordance with the *Australian Modern Slavery Act 2018* (Cth) (the Act) for the financial year ending December 31, 2020 (FY20).

Modern slavery refers to situations in which persons are coerced to work using violence or intimidation, or by more subtle means such as accumulated debt, retention of identity papers, or threats of denunciation to immigration authorities. The International Labour Organization estimated there were 24.9 million people trapped in forced labour around the world in 2016. KL Gold is against all forms of modern slavery and will take steps within its business and supply chain to address any form of modern slavery of which it becomes aware.

KL Gold exercises central direction and control over the activities of KLG A, NTMO, KLG V H and FGM. The boards of directors of each of KLG A, NTMO, KLG V H and FGM are comprised of members of management of KL Gold. This statement was produced by members of management of KL Gold in consultation with those members of management including representatives of KLG A, NTMO, KLG V H and FGM, and was approved by KL Gold’s Board of Directors in June 2021.

All dollar amounts referenced in this Statement, unless otherwise indicated, are expressed in United States dollars.

Modern Slavery Act Criteria

The reporting criteria required to be disclosed under the Act can be found in the following sections of this Statement.

Identify the reporting entity	Page 1
Describe the structure, operations and supply chains	Pages 3-5
Describe the risks of modern slavery practices in the operations and supply chains	Pages 6-8
Describe the actions taken to assess and address risks	Pages 8-11
Describe how the effectiveness of the actions is assessed	Pages 11-13
Describe the process of consultation within the corporate group	Page 1
Other relevant information	Pages 2, 13

From the President & CEO

On behalf of KL Gold and its Management and Board of Directors, I am pleased to release our first Modern Slavery Statement. At Kirkland Lake Gold, nothing is more important than the health and safety of our people, the well-being of our communities and the responsible operation of our business. We recognize that we need to take a broad view of “our people” and “our communities” when it comes to the impacts of our supply chain. We understand that the responsible operation of our business includes making sure our supply chain does not contribute to any forms of modern slavery.

We aim to Go for Gold Responsibly. This includes advancing issues of human rights, which we do through the implementation and administration of our Human Rights Policy (which accords with the International Bill of Human Rights), establishing an Executive Leadership team tasked with promoting diversity, equality and inclusion throughout the organization, pushing for our suppliers to meet our high standards through our Supplier Code of Conduct, and maintaining a global grievance standard that ensures we don’t miss important feedback from our communities.

We recently updated our Supplier Code of Conduct to allow us to obtain more detailed information from our suppliers throughout our relationship. This not only demonstrates to our suppliers our expectations regarding our and their social responsibilities within supply chains, but also gives us an opportunity to work with our suppliers to take reasonable steps to respond to risks.

We know that addressing modern slavery is a process, and it requires continuous improvement. We have started taking steps to mitigate the risks of modern slavery and human trafficking within our business and supply chains, as described in this statement, and we will continue to progress our efforts as we Go for Gold in Everything We Do.

Tony Makuch
President & CEO of Kirkland Lake Gold Ltd.

Going for Gold in Everything We Do

KL Gold is a growing gold producer operating in Canada and Australia. We produced 1,369,652 ounces in 2020 and target guidance for 2021 of 1.3 to 1.4 million ounces. Our production profile is anchored by three cornerstone operations, including the Macassa Mine and Detour Lake Mine, both located in Ontario, Canada, and the Fosterville Mine located in Victoria, Australia. In addition, KL Gold holds non-operating properties in Ontario and in the Northern Territory, Australia.

Underlying everything we do is a commitment to sustainable production. That includes achieving high levels of performance in safety, environmental management and community consultation and support. We work diligently with all stakeholders to ensure that KL Gold remains a welcome member of the communities in which we operate.

In FY20, we generated USD\$2.46 billion in gold revenue and contributed USD\$1.19 billion in payments to suppliers, USD\$306 million in wages, USD\$364 million in royalties and taxes, and USD\$116 million in dividends.

We have over 3,400 employees and contractors. Our supply chain is large and complex, with over 3,000 suppliers.

Our mines consume a variety of goods and require many services to keep running, including electricity, fuels, lubricants, chemicals, grinding media, steel, piping, parts, fleet, drilling, blasting, safety wear and equipment, professional services and technical consultants.

Our approach to addressing modern slavery is guided by our approach to sustainability:

- ensuring we provide a safe working environment;
- implementing responsible environmental practices and effective environmental management systems throughout our organization;
- creating meaningful opportunities for local employment and training;
- developing community relationships based on open and honest communication; and
- ensuring that the communities in which we operate benefit from our presence.

This approach, together with our policies respecting human rights, should help our stakeholders have confidence that we are producing gold responsibly.

Supply Chain

KL Gold’s business involves exploring for gold, developing mines, mining gold-bearing material, processing material to extract gold, and transporting gold to refiners for sale. Our goal is to ensure the communities in which we operate benefit from our presence. At every stage of our business we utilize good and services supplied by third parties. We look to support qualified local suppliers and contractors that have businesses in the regions in which we operate, including businesses that are Indigenous owned or operated. We also work with large contractors to encourage the establishment of local facilities and partnerships to build local capacity and contribute to the local economy. Of our total expenditures in FY20 of \$1.19 billion, 76% was spent with suppliers in Victoria, Australia, and Ontario, Canada. We also paid \$306 million in wages, with the majority of our employees living in the communities around our mines.



Our Supply Chain

Exploration & discovery

- Drilling contractors
- Surveying
- Geology and geophysical contractors
- Earthmoving contractors
- Analytical laboratories
- Environmental consultants

Mining

- Underground development contractors
- Tires
- Cement
- Blasting consultants
- Explosives
- Mining communications
- Fleet, maintenance, parts and equipment
- Steel

Processing

- Maintenance contractors
- Lab services
- Grinding media and processing additives
- Chemicals

General

- Camp management
- Personal Protective Equipment and Clothing
- Power
- Fuels, lubricants
- Communication and IT
- Medical, health and safety
- Insurance
- Employee benefits
- Waste management
- Legal, Accounting, Engineering and other professional services
- Freight, Haulage
- Civil contractors

Identification and Assessment of Modern Slavery Risks

KL Gold acknowledges that the risk of modern slavery still exists in high-GDP countries, and that the prevalence is higher than many people realize, particularly within groups such as irregular migrants, the homeless, workers in the shadow or gig economy, and certain minorities. With a broad network of suppliers stretching around the world, each with their own vendor relationships, there is greater risk that modern slavery could exist within our supply chain, and we must be vigilant in identifying where there is the potential to cause or contribute to modern slavery activities.

Operational and Supply Chain Risks

The Global Slavery Index ranks both Canada and Australia as low risk jurisdictions, and mines within these countries are not considered to be high risk industries for modern slavery. Our mines do, however, purchase products that are considered high risk and we do have suppliers in high risk countries. We also understand that we can indirectly elevate modern slavery risks by placing unreasonable demands on suppliers. In making our procurement decisions, we assess supply chain risk based on product, sector, geography and entity risks.

Products and services risks: Certain products and services may have high modern slavery risks because of the way they are produced, provided or used.

Sector and industry risks: Certain sectors and industries may have high modern slavery risks because of their characteristics, products and processes.

Geographic risks: Some countries may have high risks of modern slavery, including due to poor governance, weak rule of law, conflict, migration flows and socio-economic factors like poverty.

Entity risks: Some entities may have modern slavery risks because they have poor governance structures, a record of treating workers poorly or a track record of human rights violations.

In 2020, KL Gold engaged a third-party screening and monitoring service from a subsidiary of Dow Jones & Company, Inc. to facilitate a desktop assessment of all of our suppliers. The service provides an initial entity risk review of the supplier, as well as tools for further review and investigation where warranted. On an ongoing basis, the service monitors the suppliers for any changes or updates to the risk profile. KL Gold has screened and is actively monitoring all of the 3,237 suppliers we did business with in 2020.

As part of our initial review of our direct supply chain, we identified the countries from which we procure goods and services and compared those to the Global Slavery Index 2018 rankings of countries based on the estimated prevalence of modern slavery, to help assess where there might be potential risk of modern slavery with the companies with which we do business.

Geographic Risk Factors

Country of Supplier

Estimated Prevalence of Modern Slavery

(Global Slavery Index 2018 ranking, out of 167 countries assessed, with higher numbers indicating lower prevalence)

Canada	166
Australia	163
United States	158
Germany	134
China	111
South Africa	110
United Kingdom	132
New Zealand	164
Chile	162
Finland	149
France	136
Malaysia	42
Netherlands	143
Peru	118
Singapore	97
Sweden	152
Switzerland	146
Tunisia	126

We also compared the types of products we purchase to the list of goods most at risk of being produced by modern slavery as set out in the Global Slavery Index 2018.

Product Risk Factors

Products most at risk of modern slavery	Source countries	Products purchased directly by KL Gold
Cotton	Kazakhstan, Tajikistan, Turkmenistan, Uzbekistan	✓
Bricks	Afghanistan, India, Myanmar, Nepal, Pakistan	
Garments (Apparel and clothing accessories)	Argentina, Brazil, China, India, Malaysia, Thailand, Vietnam	✓
Cattle	Bolivia, Brazil, Niger, Paraguay	
Sugarcane	Brazil, Dominican Republic,	
Gold	Democratic Republic of the Congo, Korea, Democratic People's Republic of (North Korea), Peru	
Carpets	India, Pakistan	
Coal	Korea, Democratic People's Republic of (North Korea), Pakistan	
Fish	China, Ghana, Indonesia, Thailand, Japan, Russia, Republic of Korea (South Korea), Taiwan	
Rice	India, Myanmar	
Timber	Brazil, Korea, Democratic People's Republic of (North Korea), Peru	
Brazil nuts/chestnuts	Bolivia	
Cocoa	Côte d'Ivoire, Ghana	
Diamonds	Angola	
Electronics (Laptops, computers, and mobile phones)	China, Malaysia	✓

We identified that KL Gold regularly purchases electronic devices and equipment with electronic components, and that risks in the cotton and garment industries could have implications for personal protective equipment and clothing used at our sites.

Mitigating and Controlling Modern Slavery Risks

Sustainability Principles

We believe that being socially responsible is essential to KL Gold's operating and financial success, and we are committed to integrating and promoting sustainability in all facets of our business. This includes producing gold in a safe, environmentally and socially responsible manner.

KL Gold uses an Integrated Management System (IMS) to implement health and safety, environment, and human resource (including human rights) management requirements into our operations. The Management Standards are aligned with the requirements of KL Gold's policies and with recognized international and national standards, including ISO 14001, ISO 31000 and ISO 45001.

Underlying our commitment to sustainability is our support of the internationally recognized best practices and frameworks noted below, with which we comply. These not only demonstrate KL Gold's commitment to high standards of ESG performance, but also to allow external stakeholders to hold us accountable.

Responsible Gold Mining Principles

The World Gold Council (WGC) has set out the Responsible Gold Mining Principles (RGMPs) as a framework for clear expectations for consumers, investors and the downstream gold supply chain as to what constitutes responsible gold mining

United Nations Sustainable Development Goals

The United Nations Sustainable Development Goals (SDGs) are a universal set of 17 goals and 169 targets aimed at eliminating poverty, protecting the environment and providing a shared blueprint for peace and prosperity for people and the planet, now and into the future. KL Gold supports the SDGs and looks for meaningful ways to contribute to their achievement. We recognize that the mining industry has an opportunity to positively contribute to all 17 of the SDGs.

Towards Sustainable Mining

The Mining Association of Canada's (MAC) Towards Sustainable Mining (TSM) initiative promotes best practices in environmental protection, energy efficiency, community engagement, safety and transparency

International Council on Mining and Metals (ICMM)

ICMM's Mining Principles and ICMM Performance Expectations (PEs) define best practice in environmental, social and governance requirements for the industry. ICMM's Mining Principles are aligned to other responsible mining initiatives through a shared objective of improving environmental, social and governance practices at the operational level. KL Gold uses the PEs as guidance to improve our performance.

More information on KL Gold's sustainability efforts and guiding principles can be found in the 2020 [Sustainability Report](#) available on our website.

Corporate Governance

We comply with corporate governance principles and requirements set out in Canadian securities legislation, the rules and policies of the TSX, NYSE and ASX (as applicable) and industry best practices. More information on our corporate governance practices can be found in our most recent [Management Information Circular](#) available on our website. These corporate governance practices, among other things, ensure that the company respects and protects the rights of everyone within our organization and everyone within the organizations with whom we engage.

KL Gold has adopted a [Code of Conduct and Ethics](#) that is applicable to all directors, officers, employees and consultants at all of our operations. The Code of Conduct and Ethics embodies the commitment of KL Gold to conduct its business in accordance with all applicable laws, rules and regulations and high ethical standards, and documents the principles of conduct and ethics to be followed by KL Gold and its employees, contractors, officers and directors in all countries in which the Company operates. Its purpose is to promote conduct that reflects honesty, integrity and impartiality that is beyond doubt, including the ethical handling of actual or apparent conflicts of interest. All employees go through annual refresher training on the Code of Conduct and Ethics.

Policies, Standards and Procedures

KL Gold is committed to the protection of human rights and the prevention of modern slavery. Our [Human Rights Policy](#) outlines our minimum standards for ensuring respect for human rights. It includes the following commitments:

- We are committed and always strive to act in accordance with the International Bill of Human Rights (which includes the Universal Declaration of Human Rights) and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work.
- We do not tolerate violations of human rights committed by our employees, affiliates, or any third parties acting on our behalf or related to any aspect of one of our operations.
- We do not tolerate the use of child labour, prison labour, or any form of forced labour, slavery or servitude.
- We do not tolerate threats, intimidation, or attacks against human rights defenders.
- In our relationships with host governments, contractors and third-party service providers, we do our utmost to avoid being complicit in adverse human rights impacts, including benefitting from the human rights violations caused by others.

Matters, including risks, relating to sustainability and human rights issues, are subject to review by committees of the Board of Directors, including the Corporate Governance and Nominating Committee and the Health, Safety, Environment and Corporate Social Responsibility Committee. Preventative and remedial actions plans are communicated across the organization, supported by senior management and the site leadership teams to ensure effective management of issue or risk.

Procurement Process and Considerations

KL Gold's Code of Conduct and Ethics and our Supplier Code of Conduct Procurement Policy establish our values and expectations of our people and our suppliers in our procurement processes. In assessing whether to award a contract, we consider various environmental, social and governance (ESG) factors, such as environmental performance, local and Indigenous sourcing, treatment of employees (including

modern slavery risks), health and safety, compliance, and governance. All suppliers are expected to respect human rights, rights to life, liberty, security and safety of persons in their own supply chains.

We recognize that significant social benefits can be achieved through sourcing goods and services locally and we routinely evaluate local supply options as part of our overall sourcing strategies. In appropriate circumstances, we encourage suppliers to establish a local presence and to assist in creating community benefit through local and Indigenous programs and skills transference.

Supplier Code of Conduct

KL Gold has adopted a Supplier Code of Conduct that identifies our expectations of suppliers doing business with us to act responsibly, lawfully and with the highest integrity. Our Supplier Code of Conduct is incorporated into our contracts to create binding obligations, including an obligation on our suppliers to alert us if they become aware of any situation that could violate modern slavery standards. KL Gold implemented an updated version of its Supplier Code of Conduct in 2020, strengthening our requirements of our suppliers and the tools available to us to audit and investigate our suppliers, including in respect of modern slavery risks.

Our [Supplier Code of Conduct](#) is available on our website.

Supplier Contracts

KL Gold takes steps in our contracting process to make our potential suppliers aware of our human rights expectations and to control the potential risk of modern slavery arising in our supply chain. There are specific terms in our agreements and other purchasing documents specifically to help us identify modern slavery concerns and provide us with tools to address any risks that may be identified.

We require all suppliers to agree to comply with our policies and standards, including in respect of safety, environmental compliance and certain social criteria. We monitor ongoing compliance and performance as part of our contract administration and take corrective action where necessary.

Supplier Evaluation Criteria

Before including a potential supplier in a tender process, KL Gold conducts a prequalification assessment to ensure the supplier is capable of meeting our high standards, including with regards to the supplier's ESG practices. In appropriate circumstances, KL Gold may ask potential suppliers detailed questions to gain a deeper understanding of the supplier's company culture, or to address particular issues or concerns, including modern slavery risks.

Supplier Questionnaire

KL Gold has a Supplier Questionnaire that can be issued to suppliers in appropriate circumstances to assist in the identification of modern slavery risks, improve supply chain transparency and identify areas for further due diligence. It also serves to raise awareness among suppliers of the importance of modern slavery risks. The questions seek information identifying the geographic locations of the supplier's business operations, the risk of potential for modern slavery in their supply chains, the level of governance within their business, and the training needs required to make their workforce aware of modern slavery risks. New and existing suppliers can be issued with this questionnaire through the Dow Jones screening and monitoring platform.

Supplier Engagement

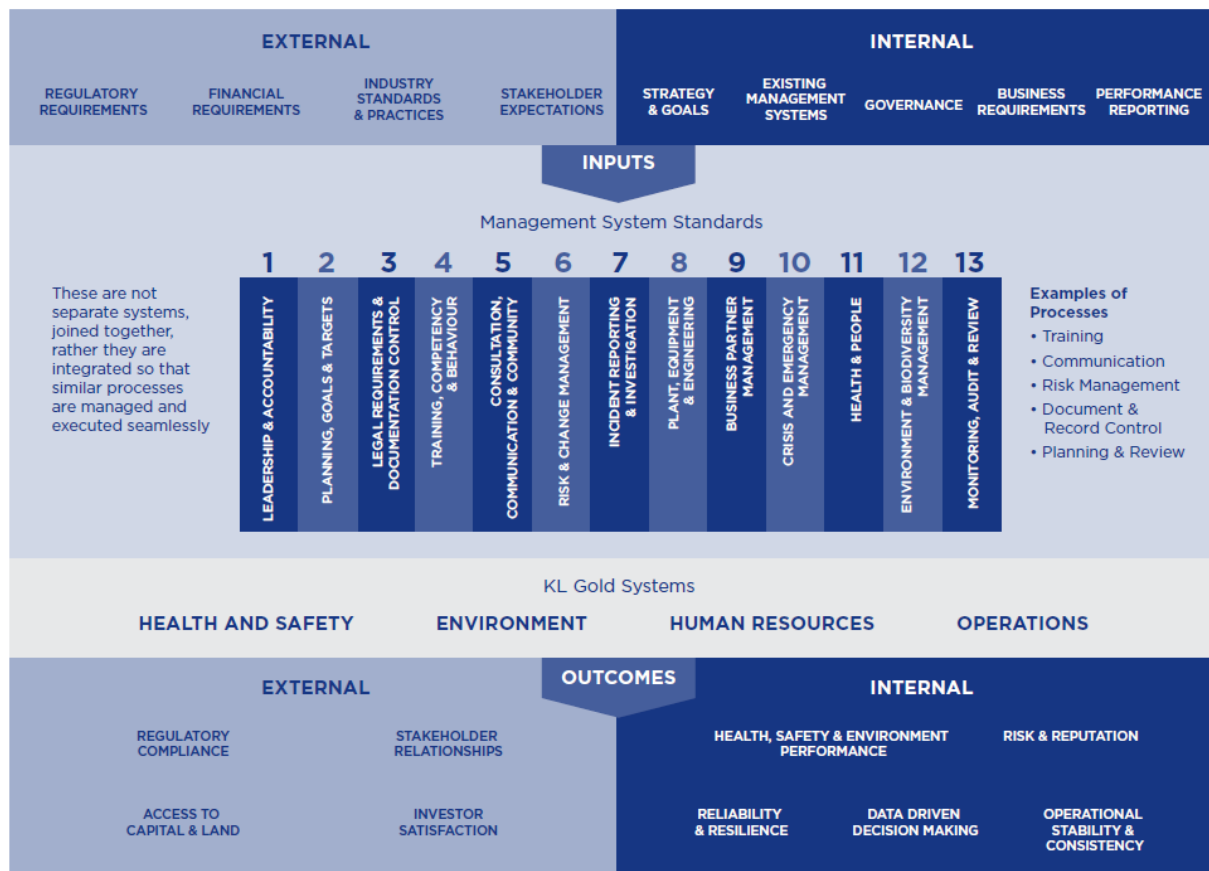
KL Gold engages with suppliers formally and informally, as appropriate to the circumstances, which may include onsite visits, requests for information and structured meetings. Engaging directly with suppliers provides insight into the experience of workers helps validate information supplied. Whenever issues are identified, we establish a plan to address the issue and monitor progress. Findings from engagements may also be used to inform and improve future due diligence assessments.

If a potential risk of modern slavery is identified, we will work with suppliers to develop a unique mitigation workplan based on the specific circumstance, which can include regular reporting and audits, supplier due diligence on supply chain (measures to identify, prevent, mitigate, account for how it is addressed), policies, programs and training, and a remediation process. KL Gold recognizes that simply terminating a relationship with a supplier may not help to address the risks identified, so we are prepared to work with suppliers to determine the appropriate corrective actions and to monitor those actions until both parties agree that the risk of modern slavery is being appropriately mitigated. If a supplier refuses or fails to demonstrate reasonable and timely efforts to implement agreed corrective actions required to operate in accordance with our Supplier Code of Conduct, or if we suspect a supplier is violating any laws, we are prepared to terminate the supplier relationship.

To date, we have not identified potential modern slavery risks with any of our suppliers.

Assessing Effectiveness of our Actions

Continuous improvement and ongoing review and assurance of our effectiveness in the management of modern slavery will be guided by and in accordance with our IMS. The intent of the IMS is to combine all related management processes into one system, providing a framework for planning, implementing, measuring performance and evaluating our efforts and commitment across the business to manage risks.



By integrating risk management, including with respect to modern slavery risks, into the company’s operations and strategic planning, we are able to track performance against plan and regularly assess both compliance with set objectives and whether we are achieving intended results.

Supplier surveys can also be an effective tool to identify potential risks in our supply chain that may not otherwise be apparent through our tendering and supplier onboarding processes. We anticipate that increasing the use of these surveys as we continue to advance our program will result in identifying additional risks within our supply chain for follow up.

Our complaints and grievance mechanisms are capable of capturing issues related to suppliers. We encourage our employees and business partners to report concerns regarding modern slavery risks through these mechanisms, though to date we have not received whistleblower reports or other complaints relating to modern slavery or other human rights abuses at our operations or in our supply chain. Should such complaints ever arise, we would work closely with the suppliers to fully, appropriately and quickly resolve issues within their workforce, and the complaint and grievance mechanisms would aid in tracking success.

By tracking our performance on employee education, supplier risk assessments, supplier surveys, and compliance with any mitigation plans, we will be able to assess the effectiveness of our efforts in addressing modern slavery risks.

Looking Ahead

We will continue to progress our efforts to review our supply chain and to monitor the progress of our modern slavery actions and due diligence processes.

Actions in FY21 will include:

- Reviewing and improving systems and processes for due diligence, risk management, training and supplier engagement with respect to modern slavery risks;
- Working with high priority suppliers, determined based on identified product, sector, geography or entity modern slavery risk factors, to improve our understanding of their supply chains;
- Continuing efforts to map suppliers and their supply chains, and assessing risks against product, sector, geography and entity modern slavery risk indicators;
- Expanding awareness of the risk of modern slavery with our existing suppliers and new suppliers being brought into our business; and
- Further developing our monitoring and assurance processes to assess our effectiveness managing modern slavery risks in our supply chain.

COVID-19

COVID-19 changed KL Gold's activities in 2020 as we refocused on supporting those who work for us and our communities. KL Gold responded to COVID-19 within the framework of our pandemic response plans, recommendations of health authorities, and local and national regulatory requirements. Our operations implemented action plans and preventive measures while seeking and considering input from our employees, contractors, communities and industry peers to ensure our actions were responsive and consistent with broader efforts.

We moved quickly to ensure the health and safety of our workforce, their families, and the communities in which we work and live, including by:

- implementing processes at a workplace level to screen every worker for symptoms before they attended work as well as restricting non-essential visitors to our workplaces;
- developing technology to reduce our need to complete paperwork, to work in proximity with each other, or to attend remote locations;
- establishing secondary, smaller workplace hubs and helping workers work from their homes during periods of high community contact potential, or due to a personal vulnerability; and
- supporting essential community initiatives and care organizations and partnering with community groups to ensure access to supplies of personal protective equipment such as medical grade gloves, masks and consumables like hand sanitizer

Infectious disease epidemics and pandemics may have a disproportionate impact on people at risk of modern slavery, including those experiencing poverty, marginalization, stigmatization, discrimination, or who have limited access to health care resources. To help minimize these disproportionate impacts and risks during the pandemic, we increased our donations and grants of emergency funding for homelessness and addiction efforts within the communities where we operate. Vulnerability of workers to modern slavery and other forms of exploitation may also increase as a result of a pandemic, due to factory shutdowns, order cancellations, workforce reductions and sudden changes to supply chain

structures. Where possible, we worked with our suppliers to minimize disruptions to the supply chain that could have the effect of increasing modern slavery risks.