



## ALAMOS GOLD INC.

TSX.AGI – NYSE.AGI

### Anti-Bribery, Anti-Corruption and Anti-Competition Policy

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#### PURPOSE:

Alamos Gold Inc. (“Alamos”) is committed to conducting business in accordance with all applicable laws, rules and regulations and the highest ethical standards, and this commitment is embodied in the Code of Business Conduct and Ethics. The purpose of this Anti-Bribery, Anti-Corruption and Anti-Competition Policy (“ABCC Policy”) is to reiterate Alamos’ commitment to full compliance by the Company and its officers, directors, employees and agents with Canada’s *Corruption of Foreign Public Officials Act* (“CFPOA”), *Canada’s Competition Act* (the “Competition Act”), the U.S. *Foreign Corrupt Practices Act* (“FCPA”), and any local anti-bribery, anti-corruption, or anti-competition laws that may be applicable. This Policy supplements the Code of Business Conduct and Ethics and all applicable laws and provides guidelines for compliance with the CFPOA, FCPA, Competition Act and all applicable Company policies.

#### SCOPE:

This Policy applies to every Alamos employee, including senior executive and financial officers, and to members of our Board of Directors (collectively referred to as “Alamos personnel”) and reflects the standards to which Alamos expects its business associates, partners, agents, contractors, and consultants to adhere when acting on Alamos’ behalf.

#### DEFINITION OF BRIBERY AND CORRUPTION:

Corruption is the misuse of public power for private profit, or the misuse of entrusted power for private gain. Bribery is the offer, promise, or payment of cash, gifts, or even excessive entertainment, or an inducement of any kind offered or given to a person in a position of trust to influence that person’s views or conduct or to obtain an improper advantage. Bribery and corruption can take many forms, including the provision or acceptance of:

1. Cash payments;
2. Phony jobs or “consulting” relationships;
3. Kickbacks;
4. Extortion;
5. Fraudulent activities;
6. Embezzlement;
7. Money laundering;
8. Facilitation payments (non-approved or publicly reported);
9. Political contributions;
10. Charitable contributions;
11. Social benefits; or
12. Gifts, travel, hospitality, and reimbursement of expenses.

No employee shall make or promise to make, directly or indirectly, any payment of money or provide anything of value to any official of a government or a political party, or a candidate for political office, which is for the purpose of inducing or influencing such person to act in any way to assist Alamos Gold in obtaining, facilitating, or retaining business, or securing any improper business advantage.

## **POLICY STATEMENT**

Alamos personnel and agents are strictly prohibited from offering, paying, promising, or authorizing:

- any payment or other thing of value;
- to any person;
- directly, or indirectly through or to a third party;
- for the purpose of (i.e., in exchange for):
  - i. causing the person to act or fail to act in violation of a legal duty;
  - ii. causing the person to abuse or misuse their position; or
  - iii. securing an improper advantage, contract or concession for Alamos or any other party.

To promote compliance with anti-corruption laws in Canada, the United States, and other applicable jurisdictions, no Alamos personnel shall undertake any improper payment activity in respect of a foreign official, a domestic official, or a person doing business in the private sector. In addition, Alamos' books and records must correctly record both the amount and a written description of any transaction. Alamos personnel must ensure that there is a reasonable relationship between the substance of a transaction and how it is described in the Company's books and records.

Specific attention should be placed on the following transactions:

1. Sponsoring travel of government or government officials;
2. Direct and in-kind support for government or government officials;
3. Security support for public law enforcement;
4. Per diems for government officials;
5. Retaining third parties, including those who may interact with the government on Alamos' behalf;
6. Contracting with state-owned entities;
7. Meals, gifts, and entertainment for government officials;
8. Donations and charitable contributions for government officials; and
9. Facilitating payments.

If any Alamos personnel are contemplating entering into one of the name transactions above (or other similar transactions), they are expected to review the nature of the transaction in light of the prohibitions and pre-clear, with those named below in the Oversight Responsibilities section, any transactions for which there is doubt about compliance with this policy.

## **DEFINITION OF ANTI-COMPETITION:**

Anti-Competition is unfair business practices that reduce or prevent competition in a market. This can lead to unfair (or disloyal) competition, higher prices, reduced quality or levels of service, or less innovation. Anti-competitive practices negatively impact consumers and increase costs to business.

Anti-competitive behaviors can take many forms, including:

1. competitors coordinating to share infrastructure;
2. agreements between competitors;
3. monopolization;
4. price fixing,
5. group boycotts, or
6. exclusionary exclusive dealing contracts or trade association rules.

All employees are responsible for adhering to the competition laws and regulations in force in the various countries in which the company operates. You must seek timely advice from the Alamos' legal department if you have any questions or concerns relating to this Policy or competition law.

## **DISCIPLINE**

Any employee who violates the terms of this Policy will be subject to disciplinary action. Any employee who has direct knowledge of potential violations of this Policy but fails to report such potential violations to Company management will be subject to disciplinary action. Any employee who misleads or hinders investigators inquiring into potential violations of this Policy will be subject to disciplinary action. In all cases, disciplinary action may include termination of employment. Any third party agent who violates the terms of this Policy, who knows of and fails to report to Alamos management potential violations of this Policy, or who misleads investigators making inquiries into potential violations of this Policy, may have their contracts re-evaluated or terminated.

## **OVERSIGHT RESPONSIBILITIES**

The Chief Financial Officer (CFO) and Vice President, General Counsel will be responsible for overall administration of Alamos' Anti-Bribery, Anti-Corruption and Anti-Competition Program. The Senior Vice President, Mexico and the Vice President, Projects, in each case along with the Chief Operating Officer (COO), are responsible for implementation and monitoring adherence to, this policy in Mexico and Turkey, respectively. The COO is responsible for implementation and monitoring adherence to this policy in Canada. If any employee is uncertain regarding the application of this policy to specific circumstances in any country in which Alamos is conducting business such employee shall escalate the matter and seek advice from his/her superior, the in-country leader named above, the Vice President, General Counsel or from the CFO.

## **INTERNAL MONITORING PROCEDURES**

Compliance with Alamos Gold's accounting and internal controls procedures is mandatory. All accounting records, expenditures, expense reports, invoices, vouchers, gifts, business entertainment and any other business records must be accurately and reliably reported and recorded. False or misleading entries will result in immediate disciplinary action. Undisclosed or unrecorded payments or assets are strictly prohibited.

## **CONTROL PROCEDURES AND PROCESSES**

The following processes are intended to reduce the likelihood of an improper transaction or business dealing and should be complied with at all times:

1. Authorization of all transactions are to be in accordance with Alamos' Delegation of Authorities Policy;
2. Regular disclosure of meetings, gifts, hospitality or donations per the monthly reporting from Mexico (overseen by the Senior Vice President, Mexico) and quarterly reporting (overseen by the COO);
3. Quarterly review of financial accounts related to gifts, hospitality, or donations;
4. Escalating pre-approval of transactions starting with the in-country lead, then the Vice President, Finance, and/or the CFO;
5. Reviewing the nature of third party engagement with the inclusion of anti-corruption language in any contractual terms and conditions; and,
6. Annual training by key personnel and acknowledgement of their understanding of this policy and the related control procedures.

## **REPORTING AND RESPONSE PROCEDURES**

Each employee has a duty to prevent breaches of this Policy by reporting any potential, or questionable, situation whether it is a breach that applies to his/her conduct, a breach by another director, officer or employee or by a supplier, service provider or contractor, to his or her superior, a mine site General Manager, to the Vice President, General Counsel or to the CFO. If you are not comfortable reporting through these channels, Alamos' anonymous feedback process allows officers, employees and third parties to report suspected violations without fear of retribution. Details of this process are included in Alamos' Code of Business Conduct and Ethics.

It is Alamos' policy that employees will suffer no retaliation for reporting potential compliance concerns in good faith. Upon receiving a report of suspected or actual violation, the Vice President, General Counsel will immediately document and investigate that report. If a violation is detected, Alamos will take prompt measures to mitigate the violation and take appropriate action for employee or third party violations.

**Dated: February 22, 2021**