

# Non-Discrimination, Anti-Harassment & Equal Opportunity Policy

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## PURPOSE

This Policy provides the framework for Franco-Nevada Corporation to maintain an environment free of discrimination and harassment (as defined below), in which all individuals are treated with respect and dignity, are able to contribute fully, and have equal opportunities.

FNC is particularly committed to the prevention of harassment and workplace violence (as defined below). FNC will take whatever steps are reasonable to protect FNC's employees from harassment and workplace violence from all sources. This Policy specifically prohibits any form of harassment or violence by or towards employees, contractors, suppliers, clients, strangers and domestic partners.

## SCOPE

This Policy applies to Franco-Nevada Corporation, its subsidiaries and affiliates (collectively or, if the context indicates, individually, referred to as "FNC") and all directors, officers, employees of FNC ("FNC Personnel") and contractors of FNC.

## POLICY STATEMENTS AND PROCEDURES/PROGRAMS

1. The diversity of FNC Personnel is a tremendous asset. FNC is firmly committed to providing equal opportunity in all aspects of employment and will not tolerate any discrimination (any form of unequal treatment based on one or a combination of the grounds below) or harassment (a course of comments or actions that are known, or ought reasonably to be known, to be unwelcome) of any kind. Examples include derogatory comments based on racial or ethnic characteristics and unwelcome sexual advances. Grounds for discrimination include the following:
  - a. Age
  - b. Creed (religion)
  - c. Sexual preference (including pregnancy and breastfeeding)
  - d. Gender identity
  - e. Family status (such as being in a parent-child relationship)
  - f. Marital status (including the status of being married, single, widowed, divorced, separated, or living in a conjugal relationship outside of marriage, whether in a same sex preference or opposite sex preference relationship)
  - g. Disability (including mental, physical, developmental or learning disabilities)
  - h. Race
  - i. Ancestry
  - j. Place of origin
  - k. Ethnic origin

- l. Citizenship
  - m. Colour
  - n. Record of offences (criminal conviction for a provincial offence, or for an offence for which a pardon has been received)
  - o. Association or relationship with a person identified by one of the above grounds
  - p. Perception that one of the above grounds applies
  - q. Any other ground that may be listed in human rights legislation that applies to that particular jurisdiction in which FNC is operating
- The Board also aspires towards meaningful progress being achieved in future in respect of the number of women in senior management positions.

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. Abuse of this Policy by using it as a means of falsely accusing or discrediting colleagues will not be tolerated.

2. To control the risks of workplace violence, FNC relies on the availability of adequate lighting throughout the building and offices with lockable doors within its office, where available, as well as building security's ability to inform tenants of potentially violent situations or people and to deal with such situations or people.
3. Franco-Nevada Personnel are encouraged to speak with the FNC's Chief Legal Officer (or delegate), when any person's conduct (including that of a co-worker) makes them uncomfortable.
4. In the case of potential or actual workplace violence, an employee should summon immediate assistance, either by telephone or by triggering an alarm, if available. During office hours on FNC's premises, an employee should contact FNC reception who will summon building security and law enforcement officials through 9-11. After office hours on FNC's premises, an employee should summon building security directly and they will summon law enforcement officials through 9-11. When not on FNC's premises, an employee should contact 9-11 directly.
5. Individuals who believe that they have been subjected to discrimination, harassment or a threat of or an act of violence should immediately report the incident to FNC's Chief Legal Officer (or delegate). The Chief Legal Officer (or delegate) is available to consult with individuals regarding external reporting of an incident (i.e. to the police, Workplace Safety Insurance Board, Ministry of Labour, etc.).
6. Complaints, whether made orally or in writing, will be promptly and thoroughly considered and if appropriate investigated by the Chief Legal Officer (or delegate), together with one or more members of the Committee of Executive Officers, if appropriate. FNC will treat such complaints as confidentially as possible, releasing information only to those with a need or right to know. The Chief Legal Officer (or delegate) will keep accurate records of the investigation for a period of at least six years following the initial complaint.
7. 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 (EAP), if available.
8. Any employee who observes or becomes aware of discrimination, harassment or workplace violence should immediately advise the Chief Legal Officer (or delegate). No employee should assume that FNC is aware of the problem. All complaints and concerns should be brought to the attention of the Committee of Executive Officers so that steps can be taken to correct them.

9. No retaliation will be taken against any employee because he or she reports a problem concerning possible acts of discrimination, harassment or violence. Employees can raise questions and make reports without fear of reprisal. Any employee having questions about what constitutes discrimination, harassing behaviour or an act of workplace violence should contact the Chief Legal Officer (or delegate).
10. The foregoing shall constitute for legal purposes FNC's harassment and workplace violence policy and program. FNC, as an employer, will ensure this Policy is implemented and maintained and that all employees and the Committee of Executive Officers have the appropriate information and instruction to protect them from violence in the workplace.
11. The Committee of Executive Officers will adhere to this Policy. The Committee of Executive Officers is responsible for ensuring that measures and procedures are followed by employees and that employees have the information they need to protect themselves.
12. FNC may create other procedures and programs to prevent and address human rights issues, which procedures may include the following elements:
  - a. A barrier prevention review, and removal plan
  - b. Anti-discrimination policies
  - d. An accommodation policy and procedure
  - e. An education and training program

**Discrimination:** means any form of unequal treatment based on a ground noted above, whether imposing extra burdens or denying benefits. It may be intentional or unintentional. It may involve direct actions that are discriminatory on their face, or it may involve rules, practices or procedures that appear neutral, but have the effect of disadvantaging certain groups of people. Discrimination may take obvious forms, or it may occur in very subtle ways. In any case, even if there are many factors affecting a decision or action, if discrimination is one factor, that is a violation of this Policy.

**Harassment:** means a course of comments or actions that are known, or ought reasonably to be known, to be unwelcome. It is any inappropriate conduct that has the purpose or effect of creating an intimidating, hostile or offensive work environment, unreasonably interfering with an individual's work performance, or affecting an individual's employment opportunity. It can involve words or actions (through, among other things, materials, statements, remarks or physical actions), that are known or should be known to be offensive, embarrassing, humiliating, demeaning, derogatory, intimidating, inappropriate or unwelcome, based on a ground of discrimination identified by this Policy or otherwise. Harassment can occur on any of the grounds of discrimination. In addition, FNC's policy prohibits harassment on any other basis. Such conduct, while perhaps not unlawful, is considered unacceptable in FNC's workplace.

**Workplace Violence:** includes the exercise of physical force by a person against an employee, in a workplace, that causes or could cause physical injury to the employee, an attempt to exercise physical force against an employee, in a workplace, that could cause physical injury to the employee, and a statement or behaviour that it is reasonable for an employee to interpret as a threat to exercise physical force against the employee, in a workplace, that could cause physical injury to the employee.

## DATE

Updated March 10, 2021. This Policy supersedes any written or oral representations that are in any way inconsistent with it. The Compensation and ESG Committee has the authority to create and amend the procedures and programs contemplated by this Policy and it may delegate that authority to the Committee of Executive Officers.