



Political Contribution And Political Activities Policy

Approved by the board on
August 1, 2019

Summary:

Midas Gold may, from time to time, encourage the advancement of sound public policy that supports its mission by using its own resources to make or support political contributions directly or indirectly. The Political Contribution and Political Activities Policy outlines the framework within which the Corporation may make political contributions.

Midas Gold Corp. (“Midas Gold”) and its subsidiaries (together with Midas Gold, the “Corporation”) encourages the advancement of sound public policy that supports its mission. The Corporation believes that, in certain cases, it may be appropriate and in its best interests, to use its own resources to make political contributions. The Corporation’s support for candidates, or other political contributions, must be made in compliance with applicable law, including without limitation the United States’ Foreign Corrupt Practices Act and Canada’s Corruption of Foreign Public Officials Act.

While the Corporation's Directors, management and employees may participate as individual citizens in the political process, decisions to do so are entirely personal and voluntary. Employees engaging in political campaign activities are expected to do so as private citizens and must, at all times, make clear that their views and actions are their own. Employees must not use their position with the Corporation to coerce or pressure other employees to make contributions to or to support or oppose any political candidates, elections, or ballot initiatives.

In jurisdictions that permit corporations to make contributions to campaigns of local, state, or federal candidates or party committees, the Corporation may evaluate and may make such contributions. The Corporation must adhere to all local, state, and federal laws regarding making and disclosing corporate contributions for political activities.