

ALMADEN MINERALS LTD.

HUMAN RIGHTS POLICY

July 28, 2021

As part of Almaden Minerals Ltd.'s ("Almaden", "we" or "our") commitment to responsible corporate citizenship, we recognize our responsibility to uphold and respect the protection of human rights in all of our business activities. Therefore, we will:

1. Respect human rights related to working conditions, freedom of association, freedom of speech, collective bargaining, maximum working hours, wages, peaceful assembly, and equal opportunity.
2. Support the elimination of all forms of child and forced labour.
3. Maintain the safety and security of our employees and operations within a framework that respects international law principles pertaining to human rights and fundamental freedoms.
4. Not discriminate against any individual based on race, religion, ethnicity, national origin, colour, gender, age, sexual orientation, citizenship, marital status, pregnancy, disability or any other legally protected characteristic unrelated to an individual's job performance.
5. Conduct diligent human rights assessments to identify and manage human rights risks and potential impacts. At a minimum, we will include the following in our human rights assessments: working conditions; non-discrimination; health and safety; security; water and environment; cultural rights of indigenous people and communities; vulnerable groups; and our key suppliers and contractors.
6. Protect the environment and preserve natural resources in order to guarantee the right of all people to a healthy environment for their development and well-being, and therefore ensure the needs of the present without compromising the future of new generations.
7. Engage our stakeholders and Indigenous communities for input and feedback related to our human rights management approach and performance.
8. Maintain formal mechanisms, including the mechanism provided under our [Whistleblower Policy](#), for stakeholders and Indigenous communities to submit and resolve complaints related to human rights matters.
9. Consider human rights risks and impacts in investment decisions, including the acquisition of new properties and mines, as well as potential mergers and acquisitions.
10. Regularly review our performance, and that of our key suppliers and contractors, on human rights matters relative to our policies and standards to enable continual improvement in our human rights management and performance.
11. Seek out opportunities to support and promote the enjoyment of human rights for our stakeholders and Indigenous communities (e.g., the right to education), with a view to creating strong and respectful partnerships and relationships in the communities in which we work.
12. Conduct human rights training for our senior corporate leadership and our operations management, including first level supervisors (including on the Voluntary Principles on Security and Human Rights)
13. Communicate this Policy internally and externally to help ensure our stakeholders and Indigenous communities understand our human rights responsibilities and commitments.
14. Enhance the positive effects that can be produced by the projects, in partnership with local communities, to maximize the benefits that these projects could bring to communities and stakeholders both during and beyond the life of the mine.
15. Publicly communicate our human rights management approach and performance.
16. In relation to interactions with public and private security forces and the public, including Indigenous communities or other local communities, act in accordance with the Voluntary Principles on Security and Human Rights.

This Policy does not supersede applicable laws and regulations in the jurisdictions in which we operate; rather, it is intended to support host governments in the protection of human rights and the prevention of human rights abuses.

This Policy is aligned with the United Nations Guiding Principles on Business and Human Rights, the United Nations Global Compact, and the Organization for Economic Cooperation and Development Guidelines for Multinational Enterprises. This includes support and respect for the human rights expressed in the International Bill of Human Rights, the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, including the ILO Convention 169 and the alignment of our security practices with the principles set out in the Voluntary Principles on Security and Human Rights.

This Policy applies to all directors, officers, employees, contractors, suppliers, work partners and other types of business associates of Almaden, our subsidiaries, affiliates and joint ventures, wherever located. The procedures and measures described in this Policy are applicable to all projects and at all phases of that project.

For any additional information on this Policy or any matters relating to our business and human rights, please contact us at info@almadenminerals.com.