

Fighting Against Forced Labour and Child Labour

Steps taken by Sandstorm Gold for the year ended December 31, 2023

The *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the “**Act**”) requires certain governmental and larger private-sector entities to submit an annual report regarding their supply chains, policies relating to forced and child labour, and steps taken to reduced forced and child labour. The report will also be available on Sandstorm Gold Ltd.’s website.

1 STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

Sandstorm Gold Ltd. (“**Sandstorm**” or the “**Company**”) was incorporated under the *Business Corporations Act* (British Columbia) (“**BCBCA**”) on March 23, 2008. The Company changed its name from “Sandstorm Resources Ltd.” to “Sandstorm Gold Ltd” on February 17, 2011. Effective June 19, 2015, Sandstorm Gold Ltd. amalgamated, by way of vertical short-form amalgamation under the BCBCA, with one of its wholly-owned subsidiaries, Premier Royalty Inc. Sandstorm Gold Ltd. was the continuing entity as a result of this amalgamation. Effective January 1, 2018, Sandstorm Gold Ltd. amalgamated, by way of vertical short-form amalgamation under the BCBCA, with one of its wholly-owned subsidiaries, Sandstorm Gold (Barbados) Limited. Sandstorm Gold Ltd. was the continuing entity as a result of this amalgamation.

The Company’s head office and registered office is located in Vancouver, British Columbia, Canada. Sandstorm has an additional office in Toronto, Ontario. Sandstorm has one significant subsidiary, Nomad Royalty Company Ltd., which is organized under the laws of the *Canada Business Corporations Act*. As used in this report, reference to “Sandstorm” or the “Company” means Sandstorm Gold Ltd. and Nomad Royalty Company Ltd.

Sandstorm is a growth-focused company that seeks to acquire royalties and gold and other metals purchase agreements (“**Streams**” or “**Gold Streams**”) from companies which have advanced stage development projects or operating mines. In return for making upfront payments to acquire a Stream, Sandstorm receives the right to purchase, at a fixed price per unit or at various fixed percentages of the spot price, a percentage of a mine’s gold, silver, or other commodity production for the operating life of the asset. These royalty and Stream interests are held on properties developed and operated by independent mining companies, and as such Sandstorm has no control over on-site operations.

As a gold streaming company, Sandstorm generates its revenue primarily from the sale of gold and other precious metals. The Company’s principal products are gold and other precious metals that it has agreed to purchase pursuant to Stream and royalty agreements. As a royalty or Stream agreement is generally entered into with a mining partner, the mining partner and their operations are considered Sandstorm’s direct suppliers. Suppliers to the mining company, which can include the

third-party trader, smelter, and/or refinery, as well as suppliers of goods and services to the mining partners are considered indirect suppliers. Sandstorm's direct suppliers are the focus of the due diligence activities performed by the Company.

Sandstorm has limited suppliers of office supplies for its corporate operations. Sandstorm also intermittently retains consultants who provide information and advice to the Company to support and supplement its due diligence when evaluating royalty and stream opportunities.

2 POLICIES AND DUE DILIGENCE PROCESSES IN RELATION TO FORCED LABOUR AND CHILD LABOUR

A Due Diligence Process

Sandstorm does not operate mining projects directly and does not exercise control over on-site operations. Therefore, the key period for assessing and identifying risks, including labour-related risks, is prior to making an investment with our partners. Accordingly, we have a due diligence process for potential operating partners.

Sandstorm's management team applies a multi-disciplinary approach when completing our due diligence review. In addition to relying on management's expertise, Sandstorm leverages the oversight and involvement of the Board of Directors to evaluate risks specific to a mining operation and the plans adopted by the operator to manage such risks. These risks include but are not limited to: the impacts of mining, operations and related activities on surrounding communities, including women, children, employees and migrant workers; an operator's ethical track record and history of corruption; the reputation of the operator, locally and internationally; workplace standards, protections and policies; and the commitments by, and track record of, the operator with respect to fundamental freedoms of individuals (including relating to freedom of association, non-discrimination and equal opportunity, and freedom from forced labour, human trafficking, and child labour).

Sandstorm's due diligence team consists of professionals with experience and expertise in the fields of geology, mining, metallurgy, engineering, government policy and finance. Where appropriate, Sandstorm also engages external experts to assess risks as part of its due diligence processes. If forced labour or child labour are identified in the Company's due diligence process, this would result in the Company's decision not to proceed with an opportunity.

B Policies

Sandstorm has been a signatory to the United Nations Global Compact since 2020. As a participant, Sandstorm has committed to voluntarily aligning our operations and strategy with ten universally accepted principles in the areas of human rights, labour, environment and anti-corruption. Furthermore, as a member of the World Gold Council, we endorse the Conflict-Free Gold Standard and Responsible Gold Mining Principles, which include principles regarding the human rights of our workforce, affected communities and all those people with whom we interact.

Sandstorm's policies and procedures relevant to human rights, which are outlined below, are guided by several international statements and principles, including Universal Declaration of Human Rights, International Labour Organization's Declaration on Fundamental Principles and Rights at Work, and United Nations Guiding Principles on Business and Human Rights.

CODE OF BUSINESS CONDUCT AND ETHICS

Sandstorm's Code of Business Conduct and Ethics (the "**Code**") documents the principles of conduct and ethics to be followed by employees, officers and directors of the Company and its subsidiaries. Sandstorm also has a Code of Business Conduct and Ethics for Consultants, which is

applicable for contractors of the Company. The Code aims to promote honest and ethical conduct; avoid conflicts of interest; promote full, fair, accurate, timely and understandable disclosures; and promote compliance with government laws, rules and regulations.

The Code states that Sandstorm does not condone any aspect of forced or compulsory labour practices. The Code also states that Sandstorm complies with and supports laws governing child labour in the countries in which we have operations, including ILO Conventions No. 138 (minimum working ages) and 182 (elimination of the worst forms of child labour).

SUPPLIER CODE OF CONDUCT

Sandstorm's Supplier Code of Conduct ("**Supplier Code**") documents the minimum principles of conduct and ethics to be followed by the Company's suppliers, including our streaming partners. This includes our expectations of our streaming partners with regard to respecting human rights, and requires partners to respect international standards on fundamental human rights and labour. The Supplier Code requires all suppliers to prohibit all forms of forced and compulsory labour, prevent the use of illegal child labour, and support the effective abolition of child labour.

WHISTLEBLOWER POLICY

Sandstorm's Whistleblower Policy provides a procedure for reporting concerns regarding adherence to the Code, while providing protection to the individual reporting the concern, and establishes a process for investigating any reported concerns.

3 PART OF ACTIVITIES AND SUPPLY CHAINS THAT CARRY A RISK OF FORCED LABOUR OR CHILD LABOUR BEING USED AND STEPS TAKEN TO ASSESS AND MANAGE RISK

Sandstorm does not operate any of the mining or other assets in which it has a royalty, stream or other interests and does not directly produce or import goods. Sandstorm has also not identified any forced labour or child labour in our activities and supply chains and considers that there is a low risk of forced labour or child labour in its current supply chains given their nature, and the limited size and scope of such supply chains. However, Sandstorm recognizes its business model is dependent on the industry operating in a responsible fashion and actively supports the industry in its efforts and initiatives and also has policies in place to mitigate related risks, as outlined above.

4 MEASURES TAKEN TO REMEDIATE ANY FORCED LABOUR OR CHILD LABOUR

As Sandstorm has not identified any forced labour or child labour in its activities and supply chains, no measures are required or have been undertaken.

5 MEASURES TAKEN TO REMEDIATE THE LOSS OF INCOME TO THE MOST VULNERABLE FAMILIES THAT RESULTS FROM MEASURE TAKEN TO ELIMINATE THE USE OF FORCED LABOUR OR CHILD LABOUR IN ACTIVITIES & SUPPLY CHAIN

As Sandstorm has not identified any forced labour or child labour in its activities and supply chains, no measures are required or have been undertaken.

6 TRAINING PROVIDED TO EMPLOYEES ON FORCED LABOUR AND CHILD LABOUR

Sandstorm's employees are required to acknowledge in writing, when hired, the key corporate policies. Key management, and the Board of Directors, are required to acknowledge in writing on an annual basis, for the key corporate policies. Sandstorm has committed to providing training, beginning in 2024, to all employees on human rights & anti-corruption.

7 ASSESSMENT ON EFFECTIVENESS IN ENSURING THAT FORCED LABOUR & CHILD LABOUR ARE NOT BEING USED IN ACTIVITIES AND SUPPLY CHAINS

As Sandstorm has not identified any forced labour or child labour or material risks of forced labour or child labour in its activities and supply chains, a formal assessment process with regards to the Company's effectiveness in ensuring that forced labour and child labour are not being used in Sandstorm's business and supply chains has not been implemented at this time. The Company will consider implementing measures to assess their effectiveness in managing such risks, should the Company's assessment of such risks change.

Attestation by Sandstorm Gold Ltd.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that the Board of Directors of Sandstorm Gold Ltd. has approved this report and that I have reviewed the information contained herein. Based on my knowledge, and having exercised reasonable diligence, I attest, on behalf of Sandstorm Gold Ltd., that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Date: May 31, 2024

/s/ Nolan Watson

Nolan Watson
President and Chief Executive Officer,
Director of Sandstorm Gold Ltd.