



Human Rights Policy

St Andrew Goldfields Ltd. is committed to providing an environment free of discrimination and harassment, in which all employees are treated with respect and dignity, are able to contribute fully and have equal opportunities.

We deal fairly and honestly with our employees regarding wages, benefits and other conditions of employment and recognize the right to various freedoms by our employees as protected under the *Canadian Charter of Rights and Freedoms (the "Charter")*. Such protected freedoms include freedom of conscience and religion, freedom of thought, belief, opinion and expression, freedom of peaceful assembly and freedom of association.

We do not tolerate discrimination and work to ensure equal opportunity for all employees. We recognize the equality rights under the *Charter* which states that every individual is equal before and under the law and has the right to the equal protection and equal benefit of the law without discrimination and, in particular, without discrimination based on race, national or ethnic origin, colour, religion, sex, age or mental or physical disability.

We comply with and strive to exceed the minimum requirements set by all applicable laws, regulations and other employment standards, wherever we operate or work.

We encourage our partners, contractors, suppliers and vendors to support these policies and we place substantial value on working with others who share our commitment to human rights.

Our commitment is formalized and manifested through various policies including our Code of Conduct, Workplace Harassment Policy, Workplace Violence Policy, and our Environmental and Health and Safety Policies. Human rights violations in the workplace are unacceptable from anyone. Our policies are enforced through investigative, disciplinary and conflict resolution programs.

St Andrew Goldfields Ltd., as the employer, will ensure that this policy is implemented and maintained and that all workers and supervisors have the appropriate information and resources, and where applicable, instruction to protect the human rights of all employees in the workplace.

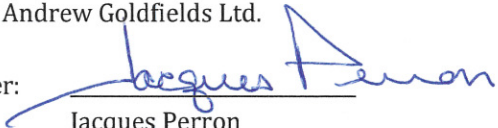
Employees must work in compliance with this policy. All employees are encouraged to raise and report any concerns about human rights violations or harassment. No worker will be penalized for making reports in good faith of incidents which violate protected freedoms or rights or for cooperating with any investigation.

Management pledges to investigate and deal with all incidents and complaints in a timely and fair manner, respecting the privacy of all concerned to the greatest extent possible.

This Human Rights Policy is adopted by the Board of Directors of St Andrew Goldfields Ltd., this 10th day of March, 2011.

On behalf of the Board of Directors of
St Andrew Goldfields Ltd.

Per:


Jacques Perron
President and CEO