

## ANTI-HEDGING POLICY

### 1. Introduction

Set forth below is the Anti-Hedging Policy (“**Policy**”) of Alio Gold Inc. (the “**Company**”). The Company believes that it is inappropriate for Directors and Senior Officers (as defined below) of the Company to hedge or monetize transactions to fix the value of equity holdings in the Company. Such transactions potentially terminate the alignment the holder’s interests from those of other Company shareholders, thus defeating the purpose of long-term incentive compensation.

### 2. Objective

The objective of this Policy is to prohibit Directors and Senior Officers from directly or indirectly engaging in hedging against future declines in the market value of any equity-based securities of the Company through the purchase of financial instruments designed to offset such risk. Such purchases may undermine the purpose for which such securities are granted.

### 3. Applicability

This Policy applies to Directors and the Senior Officers (as defined below).

“**Director**” means a director of the Company or of any of its directly or indirectly controlled subsidiaries;

“**Senior Officer**” means and includes:

(1) the Chair or a Vice-chair of the board of directors, the President, the Chief Executive Officer, the Chief Financial Officer, the Chief Operating Officer and any person holding the position of Vice-President of the Company or any of its directly or indirectly controlled subsidiaries or any of their operating divisions; and

(2) any other individual who performs or is engaged by the Company to perform functions for the Company or any of its directly or indirectly controlled subsidiaries similar to those normally performed by an individual occupying any of the offices listed in (1) above.

### 4. Prohibition on Hedging

No Director or Senior Officer may, directly or indirectly, engage in any kind of transaction, or purchase any kind of financial instrument, that is designed or would have the effect of hedging the value of equity securities granted to, or held by, such Director or Senior Officer or that could reduce or limit the Director’s or Senior Officer’s economic risk with respect to the Director’s or Senior Officer’s holdings, ownership or interest in or to common shares or other securities of the Company, including without limitation outstanding stock options, stock appreciation rights or other compensation awards the value of which are derived from, referenced to or based on the value or market price of common shares in the capital of the Company (collectively, “**Equity Compensation**”). Prohibited transactions include the purchase by a Director or Senior Officer of financial instruments (not including any Equity Compensation or securities acquired upon exercise of any Equity Compensation), including, without limitation, prepaid variable forward contracts, equity swaps, collars, puts, calls or other derivative securities that are designed to hedge or offset a decrease in market value of equity securities of the Company.

**5. Consequences of Failure to Comply**

Those who violate this Policy will be subject to disciplinary action which may include, but is not limited to, termination of employment and/or restrictions on future participation in incentive plans.

**6. General**

Nothing in this Policy in any way detracts from or limits any obligations that the Directors or Senior Officers have in law or pursuant to a management, employment, consulting or other similar agreement with the Company or any of its directly or indirectly controlled subsidiaries.

Adopted: November 6, 2019