



McEwen Inc.

Supplier Code of Conduct

1 Introduction

McEwen Inc. (“McEwen”) is committed to conducting business ethically, responsibly and in compliance with all applicable laws, regulations and internationally recognised environmental, social and governance (ESG) frameworks. This Supplier Code of Conduct sets forth the fundamental principles and expectations we have for every organisation that supplies goods or services to McEwen worldwide. Our goal is to foster long-term value creation, safeguard human rights, protect the environment and promote a culture of integrity across our supply chain. By following this Supplier Code of Conduct, our suppliers play a crucial role in supporting McEwen's mission to create long-term value for our stakeholders while minimizing our environmental impact and promoting social responsibility. We expect our suppliers to uphold these standards and, in turn, cascade equivalent requirements to their own supply network.

2 Purpose & Scope

This Code defines the minimum ethical, social, environmental and legal requirements for all suppliers, subcontractors, consultants and agents—at every tier—who provide goods or services to McEwen. Compliance with this Code is a contractual condition of doing business with us. Suppliers must monitor changes in applicable legislation and industry best practices to ensure their continued alignment. Where local laws, regulations or contractual obligations impose stricter requirements than those in this Code, suppliers must meet the higher standard.

3 Core Standards & Expectations

McEwen places a strong emphasis on human rights and fair labor practices. Suppliers are expected to provide a safe and healthy working environment, promote diversity and inclusion, and ensure that their employees are treated with dignity and respect, including:

3.1 Human Rights & Labour

- Respect and protect human rights in accordance with the Universal Declaration of Human Rights, International Labour Organization (ILO) Core Conventions and relevant UN Sustainable Development Goals (SDGs).
- Prohibit all forms of forced, bonded, trafficked or child labour.
- Ensure freely chosen employment, freedom of association and the right to collective bargaining.
- Provide fair wages that meet or exceed legal minimums, ensure working hours comply with law and offer all legally mandated benefits.
- Maintain a safe, inclusive and harassment-free workplace that is free from discrimination based on race, colour, religion, gender identity, sexual orientation, age, disability or any other protected characteristic.

3.2 Health & Safety

- Adopt and maintain robust health and safety management systems aligned with ISO 45001 or equivalent.
- Identify, assess and mitigate workplace hazards; provide appropriate personal protective equipment (PPE).
- Deliver regular training, encourage open reporting of incidents and implement corrective actions.
- Establish emergency preparedness and response plans covering fire, medical, environmental and security events.

3.3 Environmental Stewardship

- Comply with all applicable environmental legislation, permits and standards.
- Minimise greenhouse-gas emissions, waste, water consumption and other resource use through efficient processes and continuous improvement.

- Prevent pollution, responsibly handle and store hazardous substances and ensure proper waste disposal, recycling or treatment.
- Protect biodiversity and rehabilitate disturbed land in line with local regulations and industry best practice.

3.4 Transport Responsibility

- When engaged in the shipping of goods—particularly hazardous, oversized or high-value cargo—suppliers must ensure that carriers meet all applicable safety, environmental and ethical requirements.
- All shipments must be accurately documented, securely packaged and labelled in accordance with relevant regulations.

3.5 Ethical Business Practices

- Operate with honesty, integrity and transparency in all interactions and maintain accurate business records.
- Prohibit bribery, corruption, facilitation payments, money-laundering and any other form of unethical conduct.
- Adhere to competition laws, trade controls, sanctions and export-import regulations.
- Avoid conflicts of interest and limit gifts or entertainment to a nominal, business-appropriate value.
- Protect confidential information, personal data and McEwen’s intellectual property.
- Provide a confidential, non-retaliatory mechanism for employees and stakeholders to report concerns.

3.6 Responsible Resource Use & Community Engagement

- Use land, water, energy and raw materials efficiently and pursue opportunities to reduce, reuse and recycle.
- Engage constructively with local communities and Indigenous peoples, respecting cultural heritage and seeking mutually beneficial outcomes.
- Prioritise local hiring, sourcing and capacity building where feasible to support regional economic development.
- Encourage innovation, continuous improvement and knowledge sharing to enhance sustainability performance.

4 Continuous Improvement

At McEwen, we view responsible mining as an evolving practice—one that grows through reflection, learning, and adaptation. Continuous improvement is embedded in our culture, influencing everything from daily operations to long-term strategic planning. This includes advancements in methodology, safety, efficiency, and the adoption of new technologies and innovations.

We value partnerships with those who share this mindset. As expectations from our industry, regulators, and communities continue to rise, we seek to grow alongside Suppliers who are committed to strengthening performance and advancing best practices.

5 Consequences of Non-Compliance

Failure to comply with the requirements outlined in this Supplier Code of Conduct may result in one or more of the following actions:

- Suspension of work or services
- Withholding of payments
- Termination of contracts
- Removal from McEwen’s approved supplier list
- Referral to regulatory or legal authorities
- Enforcement of any applicable contractual remedies

McEwen reserves the right to take appropriate action based on the severity and nature of the non-compliance.

6 Supplier Acknowledgment

By accepting or performing any business with McEwen, the Supplier acknowledges that it has read, understood, and agrees to comply with the standards and expectations set forth in this Supplier Code of Conduct. The Supplier also agrees to flow down equivalent obligations to its own subcontractors and supply chain partners.

Contact

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