

## UK MODERN SLAVERY STATEMENT

For the fiscal year ending December 31, 2018

### INTRODUCTION

This statement is made by Endeavour Mining Corporation (“**Endeavour Mining**”) pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending December 31, 2018

Endeavour Mining is committed to doing business ethically and takes a zero-tolerance approach to all forms of modern slavery in our organization and supply chain. This statement sets out the steps taken by Endeavour Mining as at December 31, 2018 to identify and mitigate the risk of modern slavery occurring in our business and supply chain as well as the additional steps that we intend to take in 2019.

#### 1. OUR BUSINESS

Endeavour Mining is a premier intermediate gold producer with exploration, development and operational activities across West Africa. It is incorporated in the Cayman Islands and is the holding company for the Endeavour Mining group of companies. Endeavour Mining is a public company with shares listed on the Toronto Stock Exchange. It is headquartered in London with an operations office in Abidjan, Côte d’Ivoire, as well as other supporting offices. Its principal assets are the Agbaou and Ity gold mines in Côte d’Ivoire, and the Houndé and Karma gold mines in Burkina Faso.

The Endeavour Mining group directly employs approximately 2,800 employees worldwide, most of whom work on our mine sites in West Africa. Endeavour Mining’s priority has been and will always be its people. They are Endeavour Mining’s most important resource and the objective is to protect its employees’ integrity, privacy, and quality of life.

#### 2. OUR SUPPLY CHAIN

The Endeavour Mining group utilizes a network of approximately 1500 suppliers for the provision of products and services required to its support business activities, including construction materials, mining equipment, reagents, electricity, drills, explosives, fuel, tyres, manpower and transportation services.

As estimated 80% of our procurement activities come from approximately 50 key suppliers. Our suppliers network comprises both multinational entities and local suppliers in the jurisdictions in which we have exploration, development and operations activities.

#### 3. POLICIES

Endeavour Mining’s commitment to good corporate citizenship, sustainability and human rights is set out in a series of policies, procedures and management standards. Endeavour Mining’s policies are available on its website ([www.endeavourmining.com/about-us/corporate-governance/default.aspx](http://www.endeavourmining.com/about-us/corporate-governance/default.aspx))

Our **Business Conduct & Ethics Policy** seeks to ensure that employees and contractors working for the Endeavour Mining group conduct themselves in accordance with all applicable laws, rules and regulations and to the highest ethical standards. Endeavour Mining’s management and employees who, by virtue of their position, are exposed to an elevated risk of corruption receive annual training on business conduct and ethics as part of our continuous anti-corruption training initiatives. We are

in the process of including business conduct and ethics awareness as part of our standard induction training.

We have a **Human Rights Policy** which embodies Endeavour Mining's commitment to respect human rights in all aspects of our business and to seeing that all of our stakeholders are treated fairly and with dignity. The Human Rights Policy applies to all members of the Endeavour Mining group. It expressly prohibits the use of child labor and forced labor whilst also expressly recognizing the freedom of association and collective bargaining rights of our employees. Endeavour Mining does not place any restriction on which union representation employees choose, and all forms of labor representation among its workforce is welcome. Additionally, Endeavour Mining engages with union leaders regularly on matters of local labor laws, business changes and the negotiation of terms and conditions.

Endeavour Mining takes various steps to carry out its Human Rights Policy, including:

- integrating compliance (including know-your-customer checks) into our standard supplier agreements; and
- maintaining an anonymous Whistleblower system to enable reporting of potential human rights abuses (see Section 5 below).

The Human Rights Policy has been updated to expressly prohibit all forms of modern slavery, including human trafficking and slavery. We are also developing training on Endeavour Mining's human rights expectations and Human Rights Policy and reasonable human rights due diligence as part of our standard vendor certification process.

#### **4. DUE DILIGENCE PROCESSES; RISK ASSESSMENT AND MANAGEMENT**

Endeavour Mining is committed to using its commercial leverage to eliminate modern slavery and human rights abuses from its supply chain. To this end, in 2018 Endeavour Mining developed a suite of standards for supply agreements that require our suppliers to comply with Endeavour Mining's policies, including the Business Conduct & Ethics Policy and the Human Rights Policy. Endeavour Mining's personnel must use commercially reasonable efforts to get suppliers to contract on Endeavour Mining's standard terms.

A vendor due diligence and certification process is being developed in order to identify any high-risk suppliers as part of our standard vendor onboarding process. Prospective suppliers will be required to answer a questionnaire that includes questions relating to human rights compliance and the use of forced, coercive or child labor. Detailed due diligence will be required for any relationship which poses more than a moderate human rights risk.

#### **5. OUR 'WHISTLEBLOWING' PROCESS**

Feedback from our employees, contractors and stakeholders helps us identify and mitigate modern slavery risks in our supply chains. Endeavour Mining maintains a groupwide anonymous whistleblower system to enable reporting of potential misconduct to management and to the Chairman of the Audit Committee.

Endeavour Mining actively promotes the whistleblower system by referencing it in our policies and training employees at all of our offices and sites on how to use the system. English and French language posters with the email address and the toll-free number of the compliance hotline are displayed in the places where our employees and contractors work, and English and French language wallet cards with the same details are distributed to employees.

The Legal Department is responsible for ensuring that prompt, effective and appropriate action is taken in response to any reports of suspected violations. When necessary, matters are referred to Internal Audit for further investigation. We do not tolerate retaliatory action against any individual for reporting potential misconduct in good faith.

## **6. TRAINING**

Endeavour Mining's management and group employees who, by virtue of their position, are exposed to an elevated risk of corruption receive annual online training on business conduct and ethics as part of our continuous anti-corruption training initiatives. Endeavour Mining's online anti-corruption training module is based on Transparency International's recommended training program and has been designed in collaboration with external legal counsel.

Endeavour Mining's site security managers also receive specialized training on human rights and best practices for engaging with artisanal miners and other members of the local communities living near our mines. In this regard, Endeavour Mining benchmarks to the guidance provided by the Voluntary Principles on Security and Human Rights.

This human rights training will continue in 2019 and be supplemented with additional training on human rights, harassment and modern slavery. Endeavour Mining has identified Human Rights associations in its host countries to provide Human Rights training for both its own personnel and third-party security personnel in 2019.

## **7. WHAT ENDEAVOUR MINING AIMS TO ACHIEVE IN 2019**

Endeavour Mining is committed to the continuous improvement of its framework for identifying and mitigating modern slavery and human trafficking in its business or supply chains. In 2019 we plan to focus on the following key objectives

- introduce bespoke training modules on human rights and modern slavery; and
- finalize our vendor due diligence and certification process for all new suppliers to ensure that Endeavour Mining does not work with suppliers that in any way may participate in any kind of modern slavery.

## **8. SIGNATURE**

This statement was approved by the board of directors of Endeavour Mining Corporation on July 16, 2019

Signed by



Chairman of the Board

Endeavour Mining Corporation

