ENDEAVOUR MINING

UK MODERN SLAVERY STATEMENT

For the fiscal year ending December 31, 2019
INTRODUCTION

This statement is made by Endeavour Mining Corporation (“Endeavour Mining” or the “Group”) pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending December 31, 2019.

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, 2019 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 2020.

OUR BUSINESS AND ORGANIZATIONAL STRUCTURE

Endeavour Mining is a multi-asset gold producer focused on West Africa with mines in Côte d’Ivoire and Burkina Faso and a strong portfolio of exploration assets on the highly prospective Birimian Greenstone Belt across Burkina Faso, Côte d’Ivoire, Mali and Guinea.

All gold produced by Endeavour Mining is sourced from our own mining operations. We do not purchase gold from artisanal or small-scale miners. The gold, in the form of doré bars, is refined into bullion by Metalor Technologies SA, a Swiss-based refiner of precious metals and a certified member of the London Bullion Market Association, the Responsible Jewellery Council and a Fairtrade Certified Trader. Once refined, the gold is sold to one or more market participants, who take responsibility for its onward distribution to industry users, predominantly in the banking, jewellery, electronics and medical equipment sectors. Endeavour is not tied to any particular customer which allow us to obtain the best available terms for gold sales depending on global gold market conditions. Offtake arrangements are provided primarily by StoneX Group Inc, a NASDAQ listed Fortune 100 Company which trades in commodities and foreign exchange.

As a leading gold producer, Endeavour Mining is committed to principles of responsible mining and delivering sustainable value to its employees, stakeholders and the communities where it operates. Endeavour is a member of the World Gold Council and has adopted the Council’s comprehensive environment, social and governance (ESG) framework, the Responsible Gold Mining Principles.

Endeavour Mining is incorporated in the Cayman Islands and is the holding company for the Endeavour Mining group of companies, more information can be found in our Annual Information Form, available on our website: www.endeavourmining.com. Endeavour Mining is a public company with shares listed on the Toronto Stock Exchange. Its corporate office is in London with an operations office in Abidjan, Côte d’Ivoire, as well as other supporting offices.

In 2019, the Group directly employed approximately 3,700 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 our most important resource and our primary objective is to protect our employees’ integrity, privacy, and quality of life.

OUR SUPPLY CHAIN

As a major business in West Africa, Endeavour Mining utilizes a network of approximately 1,144 suppliers for the provision of products and services required to support its business activities, including construction materials, mining equipment, reagents, electricity, drills, explosives, fuel, tires, manpower and transportation services. An estimated 80% of our procurement activities come from approximately 50 key suppliers and in 2019, the share of in-country procurement was 67% of the total budget.
Our suppliers network comprises both multinational entities and local suppliers in the jurisdictions in which we have exploration, development and operations activities. We expect our suppliers to comply with our policies and standards, particularly in the key areas of human rights, health and safety, ethical business conduct, labour management and environmental stewardship. This is included in our tendering processes and contract documentation.

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 our website: www.endeavourmining.com.

Our Business Conduct & Ethics Policy seeks to ensure that employees and contractors working for the 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 mandatory annual training on business conduct and ethics as part of our continuous anti-corruption training initiatives and sign annual compliance certificates.

We have a Human Rights Policy which embodies Endeavour Mining’s commitment to respect human rights in all aspects of our business and treat all our stakeholders fairly and with dignity. This Human Rights Policy applies to all of our employees. We also ensure our contractors and suppliers commit to respecting and protecting human rights, as per our Human Rights Policy, through our tender, due diligence, on-boarding processes and contract documentation. It expressly prohibits all forms of modern slavery, including human trafficking and slavery, the use of child labor and forced labor while also expressly recognizing the freedom of association and collective bargaining rights of our employees. Endeavour Mining does not restrict which union representation employees choose, and all forms of labor representation among its workforce are welcome. Additionally, we engage 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 into our standard supplier agreements; and
- Maintaining an anonymous whistleblower system to enable reporting of potential human rights abuses (see Section 5 below).

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. We have 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.
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 independent whistleblower system to enable reporting of potential misconduct to management and the Chairman of the Audit Committee. The Legal Department is responsible for ensuring that prompt, effective and appropriate action is taken in response to any reports of suspected violations.

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. It is also available on our website: www.endeavourmining.com.

In 2019 Endeavour Mining received five complaints through our whistleblower system. We responded to all of these complaints within 48 hours of receiving them and appropriate action was taken to substantiate each of the claims. None of the whistleblower claims received in 2019 were substantiated, although one was referred to Internal Audit for further investigation. Following an investigation that included a site visit and interviews with employees identified by the whistleblower, Internal Audit concluded that there was no evidence to substantiate the whistleblower’s claim. We do not tolerate retaliatory action against any individual for reporting potential misconduct in good faith.

TRAINING

Endeavour Mining’s management and 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. Our online anti-corruption training module is based on Transparency International’s recommended training program and has been designed in collaboration with external legal counsel. In 2019, we identified 319 employees (194 managers, 76 supervisors and 49 skilled employees) as occupying sensitive positions as well as eight governance body members in Côte d’Ivoire, Burkina, Mali and the United Kingdom. We had no reported or identified cases of bribery or corruption during the year.

Our 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. Further details can be found in our 2019 Sustainability Report, available on our website: www.endeavourmining.com.

This human rights training will continue in 2020 and will be supplemented with additional training on human rights, harassment and modern slavery. Endeavour Mining is collaborating with human rights associations in its host countries to provide human rights training for both its own personnel and third-party security personnel in 2020.

WHAT ENDEAVOUR MINING ACHIEVED IN 2019-2020

Committed to Achieving Compliance with the Responsible Gold Mining Principles

Endeavour Mining is committed to being a responsible miner, creating long-term, sustainable value and sharing the benefits among all its stakeholders, from its shareholders to its host communities. As part of this commitment, in January 2019 Endeavour Mining joined the World Gold Council and has pledged to implement and achieve full compliance with the Council’s comprehensive environmental, social and governance (ESG) reporting framework, the Responsible Gold Mining Principles (“RGMPs”), by the end of 2022. The RGMPs consist of 10 umbrella principles and 51 detailed principles covering key ESG themes, including the protection of human rights and combatting all forms of modern slavery.
Introduced Business Conduct & Ethics Awareness into Standard Induction Process

In 2019 Endeavor Mining updated its standard induction training materials for employees and suppliers to highlight its commitment to doing business ethically and raise awareness of its anonymous whistleblower system.

Developed a Supplier Code of Conduct

In 2019 Endeavor Mining developed a Supplier Code of Conduct to clearly set out our expectations of our suppliers, particularly in regard to the human rights, ethical, environmental and health and safety standards. We will expect our suppliers, as well as their own subcontractors, to follow this Code and they will be assessed against it in order to successfully pass the Endeavour vendor due diligence.

This will be formally approved by the Board in early 2020 and rolled out across the Group during the year to all our suppliers, alongside appropriate training. This Code will be available in both English and French and on our website.

WHAT ENDEAVOUR MINING AIMS TO ACHIEVE IN 2020

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 2020 we plan to focus on the following key objectives:

• Introduce new training on human rights, including modern slavery;
• Roll out the Supplier Code of Conduct to all our suppliers and conduct training with the top 10 key suppliers; and
• Continue to develop the 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.

SIGNATURE

This statement was approved by the board of directors of Endeavour Mining on September 18, 2020

Signed by

Chairman of the Board

Endeavour Mining Corporation