



# GROUP PROCEDURE

## Supplier Code of Conduct

### Document Control

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0.01		New document	Nathalie Bernard Sr. West Africa Legal Counsel	Daniel Driscoll VP Legal Djarra Traore VP Supply Chain	
1.00	26 February 2020	First Issue			Mark Morcombe COO

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## 1 INTRODUCTION

Endeavour Mining Corporation (“**Endeavour**”) is committed to conducting its business in an ethical, socially responsible and sustainable manner. This extends to its suppliers, who are a vital contributor to the Company’s business. Endeavour seeks to utilize its supply chain and procurement to multiply the positive impact of the company on local, regional and national economies. Suppliers are required to understand and support Endeavour’s values in their business dealings with or on behalf of Endeavour.

## 2 SCOPE AND PURPOSE

This Supplier Code of Conduct (“**Code of Conduct**”) outlines the business and ethical standards at the core of Endeavour’s values, as defined in Endeavour’s Policies. This Code of Conduct is intended to govern the conduct of Endeavour’s suppliers, as well as their own subcontractors, by setting ethical standards they must follow and against which they will be assessed in order to successfully pass the Endeavour vendor due diligence.

An individual or an entity which provides good and/or services to or on behalf of Endeavour or any of its affiliates, directly or as a subcontractor, is a “supplier” for the purpose of this Code of Conduct, including a charitable organization if it provides goods and/or services. All transactions involving land purchases, royalties, or leases, government agencies and/or utilities, financial institutions, other Endeavour entities, joint venture partners and other mining companies are not considered to involve suppliers for the purposes of this Code of Conduct.

## 3 EXPECTATIONS AND SUPPLIER DUE DILIGENCE

Suppliers are required to comply with the following conditions to become and remain an Endeavour certified supplier.

### 3.1 Compliance with Laws and Contractual Obligations

Suppliers must comply with all relevant laws and regulations in all the jurisdictions in which they carry out activity with, or on behalf of, Endeavour as well as with their contractual obligations with regard to the areas described below.

Suppliers must take note that in the event that the laws in force in certain countries are less stringent than the standards in this Code of Conduct, suppliers must comply with this Code of Conduct. Alternately, if the local laws are more stringent than this Code of Conduct, suppliers are expected to comply with such local laws.

Endeavour has developed a set of supply contract templates which encompass Endeavour’s requirements for the areas described below and impose compliance obligations on suppliers.

#### 3.1.1 Health and Safety

Endeavour places people first and puts the highest priority on safe and healthy work practices and systems. Endeavour’s business principles and policies are based on targeting the achievement of a “zero harm” performance. Endeavour has adopted a specific *Safety & Health Policy*, published on its website, and expects its suppliers to fully comply with it, along with all site-specific health and safety procedures. Endeavour also expects its suppliers to implement safety management systems and provide appropriate training, resources and personal protection equipment to ensure occupational hazards are minimized.

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### 3.1.2 Human Rights and Diversity

Pursuant to its *Human Rights and Diversity Policies*, Endeavour is committed to treating all its stakeholders fairly, with respect and dignity and to promoting diversity. To that end, Endeavour expects its suppliers to comply with international human rights and diversity legislation and standards and to actively defend and support human rights by prohibiting and sanctioning human rights abuses within their operations. More specifically, suppliers must consult Endeavour's *Human Rights and Diversity Policies*, published on its website, and abide by them.

### 3.1.3 Labour Rights

Endeavour is committed to respecting the labour legislation of the countries in which it operates as well as international labour organizations' standards. In addition, Endeavour had adopted a *Harassment Prevention Policy* to ensure a work environment that demands respect for the dignity of each individual regardless of age, race, religion, gender, sexual orientation, handicap, national or ethnic origin. Endeavour expects its suppliers to respect workers' rights to safe working conditions, fair remuneration and work time and to prohibit the use of child labour and all forms of modern slavery, amongst other fundamental rights, by complying with applicable labour legislations and all Endeavour policies on this subject.

### 3.1.4 Environmental Protection

As stated in its *Environmental Policy*, Endeavour is committed to sustainable development and recognises that the long-term sustainability of its business is dependent on good stewardship in both the protection of the environment and the efficient management of the exploration and extraction of mineral resources. The Company's values and business principles are based on a "zero harm" environmental management performance. Endeavour expects its suppliers to abide by all applicable environmental laws, local and international standards and best industry practices.

### 3.1.5 Anti-bribery and Anti-corruption

Endeavour has a zero-tolerance approach to bribery and corruption and is committed to doing business ethically, even if this means not gaining new business, not using the services of certain agents or business partners or incurring delays in carrying on existing business.

The principles of Endeavour's *Anti-bribery & Anti-corruption Policy* have been systematically incorporated in all of Endeavour's contract templates and are based on relevant anti-bribery and anti-corruption legislation such as the *United States Foreign Corrupt Practices Act*, the *UK Anti-Bribery Act* and the *Canadian Corruption of Foreign Public Officials Act*.

Suppliers are expected to comply with all relevant legislation, Endeavour *Anti-bribery & Anti-corruption Policy* and the relevant provisions in supply contracts. In addition, suppliers are expected to report any suspected violations of such anti-bribery and anti-corruption obligations and standards – see section B of this Code for details on how to report suspected violations.

### 3.1.6 Sustainability and Community

Endeavour recognises that local communities are at the heart of the livelihood of its operations and are fundamental to its day to day work. Endeavour is committed to building strong relationships and proactively engaging in dialogue with local communities and institutions, as well as the government at a local, regional, and national level. Ultimately, Endeavour believes that the construction and operation of its mines can serve as a catalyst for further long-term regional development.

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Endeavour facilitates community development programs with a special focus on education and training – in addition to its mining investments, Endeavour is launching and financing other sustainable income-generating projects which seek to build the momentum that will attract other investors and ultimately create local sustainable economic capital for the region.

Endeavour encourages its suppliers to also sponsor and undertake community initiatives in coordination with Endeavour. Suppliers should give preference to local workforce, goods and services where possible. In addition, suppliers should assess and mitigate any negative impacts their work may have on local communities and individuals.

### 3.1.7 Compliance with Due Diligence Process

Endeavour has instituted a new vendor creation procedure which involves a supplier due diligence exercise conducted by our Security department as well as our Supply Chain department. The various site Supply Chain members have the responsibility to ensure that suppliers continue to comply with this Code of Conduct and take the necessary measures to sanction violations.

### 3.1.8 Endeavour Policies and Standards

Endeavour has adopted several policies and statements, listed below, and follows a number of international guidelines and standards. Endeavour expects suppliers to abide by them. They are available on Endeavour's website ([www.endeavourmining.com](http://www.endeavourmining.com)) in French and in English.

#### POLICIES

- › Anti-bribery & Anti-corruption Policy
- › Business Conduct & Ethics Policy
- › Corporate Disclosure Policy
- › Disclosure, Confidentiality & Insider Trading
- › Diversity Policy
- › Environmental Policy
- › Harassment Prevention Policy
- › Human Rights Policy
- › Safety & Health Policy
- › Sanction Policy
- › Whistleblower Policy

#### INTERNATIONAL STANDARDS

- › UN Sustainability Development Goals
- › UN Basic Principles of the Use of Force and Firearms by Law Enforcement Officials

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- › Voluntary Principles on Security and Human Rights
- › IFC Environmental and Social Performance Standards
- › Extractive Industry Transparency Initiative
- › World Health Organization Guidelines for Drinking Water Quality
- › International Cyanide Management Code
- › ISO 45001 OH&S

### 3.2 Violation Reporting

Suppliers are expected to instruct their directors, officers, employers and subcontractors to report suspected violations of the Endeavour Supplier Code of Conduct and Policies to a confidential and anonymous Whistleblower hotline, which is independently managed by a third party. The hotline is available 24 hours a day, 7 days a week.

Endeavour has a dedicated Whistleblower reporting mechanism whereby a person who wishes to report an instance may do any of the following:

- i) Call collect/reverse charge:
- ii) **Côte d'Ivoire, Mali, Burkina Faso,**  
[+1-604-922-5953](tel:+16049225953)
- i) **North America:**  
[+1-866-921-6714](tel:+18669216714)
- ii) Email: [endeavourmining@integritycounts.ca](mailto:endeavourmining@integritycounts.ca)
- iii) Write to Endeavour Mining Corporation  
Attention: Audit Committee Chairman  
Bureau 76, 7 boulevard des Moulins  
98000 Monaco

### AMENDMENT TO, OR WAIVER OF, THIS SUPPLIER CODE OF CONDUCT

Any amendment to, or waiver of, any provision of this Code of Conduct with regards any person to whom it applies must be approved by the General Counsel of Endeavour.

Endeavour's Chief Operating Officer and General Counsel, respectively, will review and evaluate this Code of Conduct on an annual basis to determine its efficacy.

Last Approved:

  
Mark Morcombe, COO

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