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## WHISTLEBLOWER POLICY

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### 1. Introduction

Endeavour Mining Corporation (together with its subsidiaries, the "**Corporation**") is committed to maintaining the highest standards of business conduct and ethics (see the Corporation's Business Conduct and Ethics Policy for further information). This encompasses a commitment to full compliance with all applicable government laws, rules and regulations, including those related to anti-bribery and anti-corruption, health and safety and environmental issues, human rights, corporate reporting and disclosure, accounting practices, accounting controls, auditing practices, Corporation policies and procedures, and other matters relating to fraud against shareholders.

Pursuant to its charter, the audit committee of the Board of Directors of the Corporation (the "**Audit Committee**") is responsible for ensuring that a confidential and anonymous process exists whereby persons can report any suspected accounting misconduct ("**Accounting Concerns**") relating to the Corporation. In order to carry out its responsibilities under its charter, the Audit Committee has adopted this Whistleblower Policy (the "**Policy**").

For the purposes of the Policy, the scope of reportable matters is intended to be broad and comprehensive and to include any matter, which in the view of the complainant, is illegal, unethical, contrary to the policies of the Corporation or in some other manner not right or proper – and not just Accounting Concerns. Examples include, but are not limited to:

- a) Violation of any applicable law, rule or regulation that relates to corporate reporting and disclosure;
- b) Violation of the Corporation's Business Conduct and Ethics Policy, its Human Rights Policy and/or its Anti-Bribery and Anti-Corruption Policy;
- c) Violation or the risk of violation of any applicable laws or Corporation policies or procedures in relation to health and safety or the environment;
- d) Fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Corporation;
- e) Fraud or deliberate error in the recording and maintaining of financial records of the Corporation;
- f) Deficiencies in, or noncompliance with, the Corporation's internal policies and controls;
- g) Discrimination, bullying or harassment of any description;
- h) Misrepresentation or a false statement by or to a director, officer or employee of the Corporation respecting a matter contained in the financial records, reports or audit reports; and
- i) Deviation from full and fair reporting of the Corporation's consolidated financial condition.

### 2. Communication of the Policy

To ensure that all officers, employees, consultants and contractors, and directors of the Corporation (together, referred to as "**Responsible Persons**"), are aware of the Policy, a copy of the Policy will be distributed to all Responsible Persons, or alternatively they will be advised that the Policy is available

on the Corporation's website for their review. New joiners will receive information on the Policy as part of their onboarding. Additionally, a copy of the Policy will be posted at mine sites operated by the Corporation. All Employees and Directors will be informed whenever significant changes are made.

### 3. Reporting Alleged Violations or Complaints

Canadian regulators have established rules requiring public companies to establish procedures for: (a) the receipt, retention and treatment of complaints received by the Corporation regarding accounting, internal accounting controls, or auditing matters; and (b) the confidential anonymous submission by employees of the Corporation of concerns regarding potential fraud, questionable accounting or auditing matters. The Canadian Security Administrators' National Instrument 52-110 – *Audit Committees* requires an anonymous reporting procedure to be established.

The Corporation assumes that all reports made are legitimate, real and significant enough to warrant investigation. Any person with an Accounting Concern relating to the Corporation is encouraged to submit such complaint or concern through either the confidential whistleblower facilities described below or in writing to:

Endeavour Mining Corporation  
Attention: Audit Committee Chairman  
Bureau 76, 7 boulevard des Moulins  
98000 Monaco

Any person who wishes to report an instance of known or suspected misconduct unrelated to the Corporation's accounts should do so by using the confidential whistleblower facilities described below or alternately communicate directly with their relevant mine General Manager, the head of Internal Audit or any Executive Committee member, each of whom will report any such breach to the Chairman of the Audit Committee (the "**Chairman**").

Anonymous submission boxes are also available at each of the Corporation's mine sites to ensure the reporting of such concerns on a confidential and anonymous basis.

The Corporation has also retained the services of an independent service provider to receive both phone and web-based written reports. Persons wishing to make complaints or report concerns on a confidential basis are encouraged to use the worldwide call collect/reverse charge number: +1 604 921 6875 or email [endeavourmining@whistleblowersecurity.com](mailto:endeavourmining@whistleblowersecurity.com). The service's contact details are required to be circulated to Employees and posted in corporate offices and at the mine sites. Any reports are managed by the independent, external service provider to ensure confidentiality and / or anonymity, as the report-maker may desire, and are fed through to the Chairman on such basis.

A submission should include a detailed description of the activity regarding which there is a complaint or concern and, if known, should specify the date(s) and location(s) of such activity.

The Chairman will review the details of any submissions and will determine what action will be taken. If a submission is not made anonymously, the Chairman will notify the person making the submission of the action proposed to be taken in response.

The identity of persons making submissions regarding complaints or concerns will not be disclosed by the Chairman or the external service provider without consent. The Chairman (or if escalated by the Chairman, the Audit Committee) has ultimate responsibility for whistleblower-related concerns.

#### **4. No Adverse Consequences**

A submission, in good faith, may be made by Responsible Persons without fear of dismissal, disciplinary action or retaliation of any kind. The Corporation will not charge, discipline, demote, suspend, threaten or in any manner discriminate against any person who reports in good faith or provides assistance to the Audit Committee, management or any other person or group, including any investigation by a governmental, regulatory or law enforcement body.

#### **5. Treatment of Submissions**

Concerns will be reviewed as soon as possible by the Chairman (or if escalated, the Audit Committee) with the assistance and direction of whomever the Chairman or Audit Committee thinks appropriate including, but not limited to, external legal counsel, and the Chairman or Audit Committee shall implement such corrective measures and do such things in an expeditious manner as deemed necessary or desirable to address the concerns raised.

Where possible and when determined to be appropriate by the Chairman or Audit Committee, notice of any such corrective measures will be given to the person who submitted the concerns.

#### **6. Retention of Records**

The Audit Committee shall retain all records relating to any concern or report of a retaliatory act and to the investigation of any such report for a period judged to be appropriate based upon the merits of the submission and applicable regulatory statutes or legal parameters. The types of records to be retained by the Audit Committee shall include records of all steps taken in connection with the investigation and the results of any such investigation.

#### **7. Review of the Policy**

The Audit Committee will review and evaluate this Policy on an annual basis to determine whether this Policy is effective in providing a confidential and anonymous procedure to report violations or complaints regarding Accounting Concerns; the Corporate Governance & Nominating Committee will do the same with respect to the reporting of all other violations and complaints. Both the Audit Committee and the Corporate Governance & Nominating Committee will submit any recommended amendments to the Board of Directors for approval, subject to disclosure and other policies and guidelines of the Canadian Securities Administrators.

#### **8. Queries**

If you have any questions about how this Policy should be followed in a particular case, please contact your mine's General Manager, the Chairman or the Corporate Secretary of the Corporation.

## **9. Compliance Certification**

All directors and officers of the Corporation, together with any employees, consultants and contractors specified by the Board of Directors of the Corporation, shall provide an annual certification of compliance with this Policy in the form attached to the Corporation's Business Conduct & Ethics Policy.

## **10. Amendment, Modification and Waiver**

The Board of Directors of the Corporation will review and evaluate this Policy on receipt of recommendations from the Corporate Governance & Nominating Committee and Audit Committee and/or annually to determine its efficacy.

## **11. Publication of the Policy on Website**

This Policy will be posted on the Corporation's website at [www.endeavourmining.com/Company/CorporateGovernance](http://www.endeavourmining.com/Company/CorporateGovernance).

Last Approved: March 5, 2020

Approved by: Audit Committee  
Board of Directors