

WHISTLEBLOWER POLICY

1. Introduction

Endeavour Mining plc (“**Endeavour**”), together with its subsidiaries, the (“**Group**”) is committed to upholding the highest standards of business conduct and ethics in accordance with the Group’s Code of Business Conduct and Ethics. This Whistleblower Policy (the “**Policy**”) sets out the Group’s approach to protecting whistleblowers with the aim of encouraging and supporting individuals to raise concerns about wrongdoing. This Policy should be read in conjunction with Endeavour’s other corporate policies which are available on our website at: www.endeavourmining.com/esg/governance/our-policies/.

Endeavour is committed to fostering a culture of openness across its businesses. By encouraging concerns to be raised promptly and ensuring they are addressed swiftly and appropriately, the Group seeks to minimise any potential negative impact and deter any further wrongdoing.

2. Application of the Policy

This Policy applies to all Directors, officers, employees, consultants, contractors, and agents of the Group (together, referred to as “**Relevant Stakeholders**”).

Endeavour has established a Supplier Code of Conduct (available on the Group’s website), which includes an expectation that suppliers must comply with the Legislation and the Policy, as well as the relevant related provisions outlined in their supply contracts.

3. Scope of the Policy and Reportable Conduct

Endeavour is committed to taking seriously and appropriately investigating any concerns about misconduct that are raised in good faith. The Group will take reasonable steps to safeguard whistleblowers from retaliation by protecting their identity and keeping reports strictly confidential.

For the purposes of the Policy, the scope of reportable conduct (“**Reportable Conduct**”) is broad and is intended to cover matters in the wider public interest. Reportable Conduct includes any conduct which, in the reasonable belief of the whistleblower, is illegal, unethical, contrary to the policies of the Group or in some other manner not right or proper, including but not limited to:

- a) violation of any applicable law, rule or regulation that relates to corporate reporting and disclosure;
- b) violation of the Group’s Code of Business Conduct and Ethics, and/or non-compliance with Endeavour internal policies and procedures;
- c) bribery or corruption;
- d) modern slavery and human rights breaches;
- e) fraud, money laundering, theft, or other financial irregularities;
- f) undeclared or mismanaged conflicts of interest;
- g) anti-competitive behaviour;
- h) insider trading or market abuse;
- i) breach of sanctions;
- j) data privacy violations;
- k) unlawful discrimination, workplace bullying, harassment or sexual harassment; and
- l) unsafe work practices and other significant safety or health concerns.

Endeavour has implemented a Whistleblowing Investigation Procedure to formalise safe, effective, and consistent whistleblower management when engaging with whistleblowers and conducting investigations of a Reportable Conduct. It provides greater detail regarding the processes, procedures and guidelines to be followed in conducting an Investigation in accordance with this Policy and the principles outlined herein.

3.1 What is a whistleblower?

A whistleblower is a person reporting information that he/she suspects on reasonable grounds to indicate a concern of a very serious nature. Whistleblowers can be employees, suppliers, contractors, members of the community or any other individual involved in Endeavour’s affairs who becomes aware of wrongdoing in our business activities.

3.2 What is not considered as a Reportable Conduct?

Personal work-related grievances are not considered as Reportable Conduct under this Policy. They are dealt with separately under the Employee Grievance Procedure, applicable legislation, and other relevant policies. For example, non-whistleblower grievances include, but are not limited to:

- terms and conditions of an employee contract such as pay and benefits, promotions, or workload;

- any disciplinary action imposed upon an employee or former employee such as suspension or termination; and
- labour disputes including strikes or disagreements between unions and management, or interpersonal conflict between two or more people, **except** if it concerns a person in a senior or influential position, in which case if serious it should be reported as a whistleblowing matter.

4. Implementation

The Board is accountable for ensuring this Policy is effectively implemented and it has delegated the oversight and implementation of this Policy to Endeavour's senior management and the Compliance Function.

5. Communication of the Policy

This Policy and the whistleblower process under it, is communicated to all Relevant Stakeholders:

- by way of induction training and annual refresher training;
- through posters on employee noticeboards around all the Group's sites and offices;
- on Endeavour's intranet and corporate website; and
- by references in Endeavour's Code of Business Conduct and Ethics.

The Group has implemented a Community Grievance Policy and also communicates this Policy as part of its community grievance mechanism. This Policy is also included in the Group's Supplier Code of Conduct and supplier onboarding.

6. Reporting alleged violations or complaints

Endeavour retains the services of an independent 24/7 service provider, Integrity Counts, to receive both **phone and web-based written reports** in either **English** or **French** on an anonymous basis.

Persons wishing to report a Reportable Conduct on a confidential basis are encouraged to email endeavourmining@integritycounts.ca or use the worldwide call collect/reverse charge number: +1 (604)-922-5953.

Alternatively, any person being aware of Reportable Conduct relating to the Group may submit their concern directly to their relevant mine General Manager, VP Risk and Assurance, any Executive Committee member, or their Compliance Champion, or by writing to:

Endeavour Mining plc

Attention: Chair of the Audit and Risk Committee
5 Young Street, London, England W8 5EH

The above contact details are circulated to employees in wallet cards and are posted at all corporate offices and at the Group's mine sites.

A submission of Reportable Conduct 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, in order to allow an investigation to proceed.

All reports are managed by the independent, external service provider to ensure confidentiality and/or anonymity, as the report-maker may prefer, and are communicated directly to the Chair of the Audit Committee.

The Chair of the Audit Committee, with (in most cases) the assistance of the Group General Counsel & Corporate Secretary, and the Compliance Function (the "**Investigation Team**"), will review the details of any submissions to determine how the report will be handled and / or investigated and what action will be taken.

Endeavour aims to complete the handling and / or investigation of Reportable Conduct in a timely manner. All Reportable Conduct will be reported to the Audit Committee on a quarterly basis, highlighting material instances and trends in Reportable Conduct identified from this Policy.

The identity of persons making valid submissions in good faith regarding Reportable Conduct will not be disclosed by the Chair of the Audit Committee or to Investigations Team without their consent. The Chair of the Audit Committee (or if escalated by the Chair of the Audit Committee, the full Audit Committee) has ultimate responsibility for whistleblower-related concerns.

7. No adverse consequences

A submission, in good faith, may be made by Relevant Stakeholders without fear of dismissal, disciplinary action or retaliation of any kind. Endeavour 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 in respect of any investigation by a governmental, regulatory or law enforcement body.

8. Retention of records

The Audit Committee, with the assistance of the Investigation Team, will retain all records relating to any report of a retaliatory act and 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 includes records of all steps taken in connection with the investigation and the results of any such investigation.

9. Review and amendment of the Policy

Endeavour's 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 Reportable Conduct. The Audit Committee will submit any recommended amendments to the Board of Directors for approval.

Last approved:
4 March 2026

Approved by:
Audit & Risk Committee
Board of Directors of Endeavour Mining plc