



ANTI-BRIBERY AND CORRUPTION

Where impacts occur

- The Group and our supply chain

Relevant policies

- Supplier Code of Conduct
- Code of Business Conduct and Ethics
- Anti-Bribery and Anti-Corruption Policy
- Whistleblower Policy
- Conflict of Interest Declaration

[Click here to see policies](#)

Reporting frameworks and initiatives

- GRI 205
- SASB EM-MM-510
- RGMP 1 Ethical Conduct
- UN Global Compact Principle 10 Anti-Corruption

WHY IT MATTERS

We are aware of the risks to our business, and the risks involved within our supply chain, arising from unethical business practices. To mitigate these, we maintain robust anti-bribery and corruption policies, supported by systems designed to monitor, detect and prevent any form of improper conduct.

MANAGEMENT APPROACH

Endeavour is committed to doing business in a safe, ethical, socially responsible, and sustainable manner. Our approach to governance is underpinned by this commitment which ensures the long term success of our business, thereby delivering shared benefit to all our stakeholders.

As a minimum, we comply with all applicable laws and regulations in the countries in which we operate and, where laws are lacking or limited, we augment these with international and industry best practice.

We have a zero-tolerance approach to bribery and corruption, enshrined in our Anti-Bribery and Anti-Corruption Policy (ABC Policy) which sets out the

framework for ensuring we conduct our business in an honest and ethical manner, reflecting the highest standards of integrity. Operationally, the framework has strict controls throughout the business, including the reporting through the Group's Gifts, Entertainment and Hospitality Procedure, ensuring all third-party partners undergo rigorous due diligence and enforcement of strict record-keeping. We require all our employees to comply with our ABC Policy, and any breach may result in disciplinary action.

We also expect our contractors, suppliers, and business partners to comply with our ABC Policy, which is included in our Supplier Code of Conduct.



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In addition, we have an anti-bribery and anti-corruption clause in all our supplier contracts and undertake vendor due diligence as part of our supplier onboarding and contract renewal process. A signed compliance certificate by the third parties is required as part of the due diligence process. By signing a compliance certificate, the supplier acknowledges that they have read and understood our policies. In the interests of ethical conduct, we have committed to a number of external standards, including EITI and the WGC RGMPs. See further information in our Supply Chain fact sheet.

Our Compliance Team and Audit Committee ensure that we conduct our business in compliance with all the relevant anti-bribery and anti-corruption legislation, including the UK Bribery Act of 2010, the Canadian Corruption of Foreign Public Officials Act (CFPOA), the US Foreign Corrupt Practices Act (FCPA), and anti-bribery and anti-corruption local laws. They assess corruption and bribery risk within the business and work to address these risks through policies, procedures, risk assessments and guidelines.

Training

We conduct mandatory, annual bilingual anti-bribery and anticorruption training for all directors, executives, managers, and employees in positions where the risk of corruption is elevated, such as politically exposed positions or employees working in our supply chain department. This equips our teams with the necessary knowledge to identify and respond appropriately to risks of corruption. They are also required to sign compliance certificates on an annual basis, which we publicly report on annually in our Sustainability Report.

How we ensure our approach is effective

We have a Whistleblowing Policy and Endeavour Speak Up is our bilingual 24/7 independent, confidential, anonymous reporting service. The hotline is communicated to our employees in a number of ways, including as part of site inductions, on employee noticeboards around our sites and offices, on our intranet and corporate website, as well as in our Code of Business Conduct and Ethics. We also communicate it as part of our community grievance mechanism and include it in our Supplier Code of Conduct and supplier onboarding.

Any submissions of reportable conduct is 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 the assistance of the Group General Counsel, and the Legal Compliance function, will review the details of any submissions in a timely manner to determine how the report will be managed.

All whistleblower submissions are reported to the Audit Committee of the Board of Directors on a quarterly basis. The Audit Committee receives and reviews reports on the investigation and resolution of complaints raised through the whistle-blower channel.

Endeavour encourages a culture of openness where employees and business partners can raise concerns and report any behaviour without fear of retaliation of any kind that violates our policies or standards, including unethical, fraudulent, or illegal financial activity.

We conduct due diligence on all our third parties, and we communicate all our policies to them. A signed compliance certificate by the third parties is required as part of the due diligence process.

To ensure that the ABC policy and whistleblowing policy are both effective, we conduct internal audits of ABC procedures and a third party conducts ABC baseline risk assessments every three years.

RESPONSIBILITY AND ACCOUNTABILITY

The Board is accountable for the overall governance of the Company and has delegated the oversight and implementation of the anti-bribery and anti-corruption policy to Endeavour's senior management and the Group compliance function.

The Board is supported by the Audit Committee, which receives and reviews reports on the investigation and resolution of complaints raised through the whistle-blower hotline. The anti-bribery and anti-corruption policy is reviewed and evaluated by the Audit Committee on an annual basis to determine whether the Policy is effective in ensuring compliance by the Group and its relevant stakeholders with the legislation.

Each Endeavour employee as well as consultants, contractors and agents of Endeavour are responsible for complying with our policies and sign a compliance certificate to pledge that they have read our policies on an annual basis.

