

ANTI-BRIBERY & ANTI-CORRUPTION POLICY

1. Introduction

Endeavour Mining plc (“**Endeavour**”, together with its subsidiaries, referred to as the “**Group**”) is committed to ensuring that business is conducted in compliance with all relevant laws and regulations applicable to the Group, including the UK Bribery Act 2010, the Canadian Corruption of Foreign Public Officials Act (CFPOA), and the US Foreign Corrupt Practices Act (FCPA), and antibribery legislation in its countries of operation (collectively the “**Legislation**”).

Endeavour has a zero-tolerance approach to bribery and corruption. Any attempt to offer, give, receive, or solicit bribes or engage in any corrupt activities will not be tolerated, and will result in disciplinary action, including termination of employment, contract or consulting arrangements and legal consequences, where applicable. This anti-bribery and anti-corruption policy (the “**Policy**”) should be read in conjunction with Endeavour’s anti-bribery and anti-corruption procedures which are available on the Group’s intranet and other corporate policies which are available on our website at: www.endeavourmining.com/esg/governance/our-policies/.

2. Application of the Policy

This Policy applies to all Directors, officers, employees, consultants, contractors, and agents (together, referred to as “**Relevant Stakeholders**”) of the Group. Relevant Stakeholders who conduct business on behalf of the Group must follow the Policy. This Policy reflects the standards of honest and ethical conduct to which the Group expects its business associates, partners, agents, and consultants to adhere when acting on the Group’s behalf. Relevant Stakeholders are provided with or directed to a copy of this Policy and all agreements with consultants, contractors, and agents include a provision that the consultant, contractor, or agent must comply with this Policy at all times.

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. Objective of the Policy

The objective of this Policy is to set out the Group’s approach to ensuring that business is conducted in an honest and ethical manner, reflecting the highest standards of integrity and in compliance with the Legislation. Compliance with this Policy is required under the Group’s Code of Business Conduct and Ethics.

4. Prohibition of improper payments

The Group strictly prohibits the giving, accepting, or requesting of any bribe or anything that could be perceived as a bribe, whether directly or indirectly through a third party or by a third party associated with the Group. This Policy applies to private commercial activity and to activity involving public officials.

A “bribe” is any financial or other advantage which is offered, provided, authorised, requested or received as an inducement or reward for the improper performance of a person’s relevant function or the receipt of which is itself improper.

Accordingly, the Group and its Relevant Stakeholders must not:

4.1 Government/Public bribes

- (a) directly or indirectly, offer, promise, or give any financial or other advantage to a public official (or to another person at that public official’s request, assent, or acquiescence) intending to influence the public official for the purpose of obtaining or retaining business, or an advantage in the conduct of business. Influencing a public official can include influencing them to do something which is within the scope of their public duties or which they may otherwise have done in any event; or
- (b) agree to or comply with any demands for a financial or other advantage made by a public official.

A “public official” includes:

- any officer, employee or representative of, or any person otherwise acting in an official capacity for or on behalf of a government authority;
- any employee of a government-owned or government-controlled entity;
- a legislative, administrative or judicial official, regardless of whether elected or appointed;
- an officer of, or individual who holds a position in, a political party;
- tribal chiefs and other officers of communities, who have authority to exercise powers;
- a candidate for political office; or
- an immediate relative of any of the persons listed above.

In practice, this can include but is not limited to civil servants, inspectors, members of a political party, employees of a state university, judges, customs and immigrations officials, ambassadors and embassy staffs, and law enforcement personnel.

In line with the Group's commitment to transparency and ethical conduct, all dealings with public officials must be for legitimate business purposes only. These interactions must comply with the Group's Interacting with Public Officials Procedure.

4.2 Private bribery

offer, provide, authorise, request, or receive a bribe or anything which may be viewed as a bribe either directly or indirectly or otherwise through any third party or perform a function improperly in anticipation or as a consequence of a bribe.

4.3 Kickbacks and false commissions

kickback any portion of a contract payment to any third party (including employees of another contracting party) or use other techniques, such as subcontracts, purchase orders or consulting agreements, or commissions to channel bribes to any third party (including but not limited to public officials, employees of another contracting party, their relatives or associates);

4.4 Facilitation payments

offer, make, pay or receive any facilitation payment to or from any third party including, but not limited to, public officials;

A "facilitation payment" is a form of bribery and means any payment made to encourage the recipient or a third-party to perform their existing obligations or role or expedite a routine task they are otherwise obligated to do. These can be payments to perform routine tasks, including (a) the issuance of a permit, licence or other document to qualify a person to do business; (b) the processing of official documents, such as visas and work permits; (c) the provision of services normally offered to the public, such as mail pick-up and delivery, telecommunication services and power and water supply; and (d) the provision of services normally provided as required, such as loading and unloading of cargo, the protection of perishable products or commodities from deterioration or the scheduling of inspections related to contract performance or transit of goods;

4.5 Political contributions

make any contributions or provide any financial support, directly or indirectly, to political parties or candidates on behalf of the Group;

4.6 Donations and sponsorship

make any charitable or community contributions on behalf of the Group without first obtaining formal internal approval for such contribution in accordance with the Donations and Sponsorship Procedure of the Group.

Given the nature of the Group's business, the Group may periodically be asked by governments or relevant State agencies, or may be required by law, to contribute financially or in kind, or to partner with relevant State agencies, in the development of local communities and services for those communities, and for infrastructure near its assets, such as roads, schools, medical facilities and worker housing, or for other critical national initiatives. As part of the Group's commitment to corporate responsibility and sustainable development, all donations and sponsorship, whether monetary or in-kind, must meet the requirements of the Group's Donations and Sponsorship Procedure which is available on the Group's intranet;

4.7 Employment of public officials

- (a) employ or accept the nomination of any public official or any relatives of a public official. However, if the Group (acting through its applicable procedures) deems necessary, then such a person may be employed or nominated to a position provided:
- i. it is required by the applicable written laws of the host country in relation to the free-carried equity interest or working equity interest of the host country in any mining or development asset;
 - ii. following appropriate scrutiny, it can be demonstrated that retention of such person does not conflict with his or her official duties, and any applicable remuneration outside of his or her official duties is permitted under local law;
 - iii. the reputation, background and past performance of the employee is properly researched and documented to ensure the employee is qualified for the intended duties and has a reputation for integrity; and
 - iv. the services to be rendered by the person are such that the employment of the person does not conflict with Section 4.1 (Government/Public bribes) of this Policy;

4.8 Gifts and entertainment

give, offer, or receive directly or indirectly, inducements, including gifts and entertainment, on a scale that might be perceived as creating an obligation on the recipient, or to influence a decision by the recipient. Gifts and entertainment are acceptable to give or receive, provided they meet all the mandatory requirements as specified in the Group's Gifts, Entertainment and Hospitality Procedure;

If you are in any doubt as to the appropriateness of the offer of a gift, hospitality, or entertainment you should seek further guidance from the Gifts, Entertainment, Hospitality Procedure or reach out to the Compliance Function.

5. Extortion

The Group and its Relevant Stakeholders will reject any direct or indirect request by any third party (including but not necessarily limited to a public official) for a bribe (including a facilitation payment), even if by rejecting such a request the Group is consequently threatened with adverse commercial actions.

The Group does, however, recognise that in some cases an individual's own welfare and safety could be at risk if they do not respond to such requests. If you find yourself in this situation, you should never put yourself in danger but should promptly report the request to the Compliance Function, the Head of Internal Audit, an Executive Committee member, or the Audit Committee Chair.

All reports will be treated confidentially, and the Group will take appropriate measures to investigate and address the incident while ensuring the safety of the individual reporting.

6. 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. Senior management develops, implements, monitors, and maintains a system of internal controls to facilitate compliance with this Policy, as well as to foster a culture of integrity and maintain high ethical standards throughout the Group.

The Group is dedicated to conducting regular risk assessments and audits to identify and address potential bribery and corruption risks within its operations and supply chains.

7. Communication of the Policy

A copy of this Policy has been or will be made available to all Relevant Stakeholders of the Group as well as its auditors, legal counsel, and other advisers. It is also displayed on the Group's intranet and website at www.endeavourmining.com. Relevant Stakeholders are required to refer to Endeavour's website regularly to keep themselves informed of changes made to this Policy from time to time. A copy of the current version of this Policy may also be obtained at any time from the Company Secretary.

8. Compliance

When discharging their duties all Relevant Stakeholders are expected to comply with the Legislation and other laws, regulations and rules of the jurisdiction where they carry out their business duties on behalf of the Group *and* all jurisdictions where the Group conducts its business activities, and in particular with respect to corrupt practices laws, regulations and rules. Where uncertainty or ambiguity exists, they should consult the Compliance Function.

It is a fundamental principle of this Policy that discretionary decisions relating to the contents described herein should not be made "in the field", but rather, should be referred through the procedures of the Group to the Compliance Function for approval which will make such decisions with advice from external legal counsel if necessary.

9. Training and compliance certification

All Directors, officers and employees are required to annually provide a certification of compliance with this Policy. Additionally, Directors, officers and employees must complete anti-bribery and corruption training on an annual basis.

10. Reporting alleged violations or complaints

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

Anyone wishing to submit a complaint on a confidential and anonymous basis are encouraged to email endeavourmining@integritycounts.ca or use the worldwide call collect/reverse charge number: +1 (604)-922-5953.

Alternatively, any person that becomes aware of actions relating to the Group which could constitute a violation of this Policy is required to report it 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

11. Consequences of non-compliance with Policy

Failure to comply with this Policy may result in severe consequences, which could include internal disciplinary action and possible termination of employment, contract or consulting arrangements. The violation of this Policy may also violate the Legislation and if it appears that a Relevant Stakeholder may have violated the Legislation, then Endeavour may refer the matter to the appropriate regulatory authorities. This could lead to criminal prosecution or civil action resulting in penalties, fines, and imprisonment.

However, the Group will not take disciplinary action against any individual who makes a payment in such circumstances if they genuinely believe that they or their family members would have been put in danger if they had not done so. See Section 5 (Extortion) above.

12. Review and amendment of the Policy

Endeavour's Audit Committee will review and evaluate this Policy on an annual basis to determine whether the Policy is effective in ensuring compliance by the Group and its Relevant Stakeholders with the Legislation. The Audit Committee will submit any recommended amendments to the Board of Directors for approval.

Last updated:
4 March 2026

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