

# ECONOMIC SANCTIONS & INTERNATIONAL TRADE CONTROLS COMPLIANCE POLICY

## 1. Introduction

The Board of Directors of Endeavour Mining plc (together with its subsidiaries, referred to as “**Endeavour**” or the “**Group**”) is committed to compliance with all applicable economic sanctions and international trade controls laws, rules, and regulations (the “**Legislation**”), including through identifying, managing, and minimising the risks of a potential violation.

Many of the countries in which the Group conducts business, and with which the Group has ties, maintain economic sanctions and trade controls regimes. Economic sanctions include:

- Embargoes or other total prohibitions on dealings with specified jurisdictions or regions.
- Financial sanctions such as (i) prohibitions on dealings with persons designated as sanctioned persons on lists maintained by relevant authorities such as the US Treasury Department’s Office of Foreign Assets Control (“**OFAC**”), the UK HM Treasury’s Office of Financial Sanctions Implementation (“**OFSI**”), the European Commission and Global Affairs Canada, as well as entities which are owned or controlled by such persons (in accordance with the relevant thresholds of the relevant jurisdiction) (“**Designated Persons**”), (ii) restrictions on investment and (iii) other financial measures e.g. prohibitions on loans
- Trade sanctions such as (i) prohibitions on exporting or supplying certain products to specified persons or jurisdictions, (ii) prohibitions on importing or purchasing certain products which originate in or are exported from certain jurisdictions and (iii) prohibitions on the provision of certain services to specified persons or jurisdictions (Collectively, “**Sanctions**”).
- It is Group policy to comply with Sanctions imposed by Canada, the EU, the UK and the US, as well as any other applicable Sanctions and trade control regimes. The regimes of these jurisdictions are not harmonised and therefore conflicts may arise (including between these regimes and other applicable Sanctions, such as by application of so-called blocking sanctions or measures). If there is a conflict between Sanctions, or between this Policy and applicable Sanctions, the Compliance Function will provide further guidance.

This Economic Sanctions and International Trade Controls policy (the “**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/](http://www.endeavourmining.com/esg/governance/our-policies/).

## 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**”). Relevant Stakeholders who conduct business on behalf of the Group must follow the Policy.

This Policy reflects the standards 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 includes a provision that the consultant, contractor, or agent must abide by 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 ensure that Endeavour, together with its Relevant Stakeholders, conducts its business in an honest and ethical manner reflecting the highest standards of integrity and in compliance with the Legislation and all relevant laws, rules, and regulations applicable to it. Compliance with this Policy is required under Endeavour’s Code of Business Conduct and Ethics.

## 4. Policy statement on Sanctions and trade controls

The Group will not:

- Conduct business in or with, or have any dealings with the government of, any country or territory that is the subject of comprehensive sanctions (without limitation: Cuba, Iran, North Korea, Syria, the Crimea, People’s Republic of Donetsk and People’s Republic of Luhansk Regions of Ukraine, and the non-government controlled areas of the Zaporizhzhia and Kherson oblasts of Ukraine).
- Conduct business with or have any dealings in connection with Designated Persons.
- Engage in any dealing, transaction or activity prohibited by Sanctions, or which would otherwise expose Endeavour to the risk of non-compliance with Sanctions or being subjected to negative consequences under Sanctions.

If individuals identify that Sanctions may be relevant to an activity, transaction or business they should consult with Endeavour's Compliance Function. In the event that there is a conflict between Sanctions (including as a result of the application of blocking measures), or between this Policy and applicable law, then it should be escalated to the Endeavour Compliance Function for review, who will, as necessary, consult with outside counsel and the Audit Committee.

## 5. Permissible Sanctioned business

In certain cases, the Group may operate under an exemption or seek a licence from the applicable regulatory authority to do business with or connected to a Sanctioned jurisdiction of Designated Person, or to engage in a transaction or activity prohibited by Sanctions or trade controls. However, no business will be conducted with any person to whom Sanctions apply, or in relation to a transaction or activity prohibited by Sanctions or trade controls, unless and until the Compliance Function has confirmed the availability of the exemption or such a licence has been obtained.

## 6. Screening for Sanctions and trade controls

To ensure compliance with this Policy, Endeavour has implemented a risk based due diligence process including screening to prevent dealings with Designated Persons and to detect exports, re-exports, and transfers that may be prohibited by Sanctions and / or trade controls. The Group conducts risk based due diligence and screens its counterparties and associated persons (such as shareholders, officers, directors, and its beneficial owners in line with its internal Third Party Due Diligence Procedure.

## 7. Implementation

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

## 8. Communication of the Policy

A copy of this Policy has been or will be made available to all Relevant Stakeholders as well the Group's auditors and its legal and other advisers. It is also displayed on the Group's intranet and website at [www.endeavourmining.com](http://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.

## 9. Point of contact for the Policy

Sanctions and trade controls are complex and vary greatly by country and industry. You should ask the Compliance Function if you have any questions or concerns regarding Sanctions or trade controls, including but not limited to if you are concerned that there is a conflict between applicable Sanctions, or this Policy and applicable Sanctions.

To determine if a person or entity is a Designated Person, you should contact the Compliance Function.

## 10. Compliance

When discharging their duties, Relevant Stakeholders are expected to comply with the laws, regulations and rules of the jurisdictions in which they carry out their business duties

on behalf of the Group, and all jurisdictions in which the Group conducts business, and in particular with respect to Sanctions and trade controls, those of Canada, the EU, UK and US 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 Legal Department for approval.**

## 11. Training and Compliance Certification

All Directors, officers and employees are required to annually provide a certification of compliance with this Policy. Additionally, employees specified by management must complete Sanctions and trade controls training on an annual basis.

## 12. Reporting Violations

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 and confidential basis.

Anyone wishing to submit a complaint on a confidential basis is encouraged to email [endeavourmining@integritycounts.ca](mailto: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

## 13. Consequences of non-compliance with the Policy

Failure to comply with this Policy may result in severe consequences, which could include internal disciplinary action, including but not limited to termination of employment or consulting arrangements. The violation of this Policy may also violate certain laws (particularly those of the United States and the United Kingdom). If it appears that a Relevant Stakeholder may have violated such laws, then the Group may refer the matter to the appropriate regulatory authorities, which could lead to criminal prosecution or civil action resulting in penalties, fines, and imprisonment.

## 14. 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 with the Legislation by the Group and its Relevant Stakeholders.

Last updated:  
4 March 2026

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