



**Code of Conduct  
of ENDOMINES Group**

**CEO's words**

I am very proud of the Endomines Code of Conduct. This Code of Conduct helps all of us to understand what is expected from us when we perform our daily duties and make daily decisions. This has a strong link to company culture. When we all work to the same direction and follow the same fundamental business principles, we create a company culture that we can be proud of.

At Endomines we are committed to Environmental, Social and Governance (ESG) focused mining. The commitment in the field of ESG is also highlighted in the Code.

I encourage everyone to spend time to thoroughly read this Code and think what kind of situations we can face ourselves where this Code provides guidance. Please note that the Code also applies to our business partners. If we see actions which clearly conflict with the fundamental principles described in the Code, we must speak up and use our whistleblowing channel to report the actions. This Code is part of our culture and let's value the principles described in the Code.

Kind regards,

A handwritten signature in blue ink, appearing to read 'Kari Vyhtinen'.

Kari Vyhtinen

CEO of Endomines



## **INTRODUCTION**

Endomines Code of Conduct (Code) describes the principles of how we operate and treat our employees, partners, and other stakeholders. It describes our commitment to ethical business operations. The Code applies to all employees and managers irrespective of their position or location. Each person is responsible for his or her actions and accountable for the consequences of non-compliance with this Code.

We also expect our business partners, subcontractors, suppliers and other vendors to follow the fundamental principles of our Code.

## **FOR THE PEOPLE**

### **Health and Safety**

Safety is our #1 priority. We want all our employees and partners to return to home safely. We also measure and make actions to continuously improve employee wellbeing. Our objective is to have zero accidents. We report observations, incidents and near misses promptly. We are committed to act when we see unsafe performance. We continuously improve our operations based on the observations made. We understand that safe working culture requires all of us to be working continuously towards to zero accident goal.

Our leaders are expected to “walk the talk” by always showing good example and prioritizing safety work in their daily schedules. We are committed to provide necessary training and tools to operate safely. When we select personal protective equipment, we are committed to select the most suitable for the purpose.

We expect all our employees and partners to be committed to follow Endomine’s Health and Safety Policy and other policies.

### **Alcohol and drug use**

Any employee, business partner or contractor must be free from the influence of alcohol, drugs or any medication that may impair their ability to execute their duties safely. Consumption of alcohol, drugs or similar substances while performing operational work duties at Endomines premises is strictly forbidden. Our actions focus on educating our employees, undertaking testing, and providing support to those in need. We expect everyone to voluntarily accept random testing, when so requested.

### **Labour and human rights**

We are committed to respect labor and human rights in everywhere we operate. We also expect our suppliers and other business partners operate in a same way. These rights cover

# Endomines

the right to equal remuneration for equal work, a zero-tolerance approach to modern slavery, forced labor, child labor and any kind of unfair discrimination.

## **Diversity And Equal Opportunity**

Endomines strives to value and recognise everyone's contribution and strengths regardless of gender, ethnicity, colour, age, race, religious belief, national origin, sexual orientation, marital status, disability, trade union activity or any other status protected by law or regulation. We recruit and promote employees based on their competence and performance.

## **Discrimination, Harassment and Bullying-Free Workplace**

Endomines is committed to providing a work environment that is free from harassment, discrimination, and bullying. Any employee, contractors and consultants must not discriminate, victimise, intimidate, or harass any other internal or external party or members of the public for any reason. Endomines has a zero-tolerance approach and encourages any party noticing this kind of behaviour to report this to Endomines Whistleblowing channel.

We are committed to offer training and other active measures to ensure sufficient knowledge on how to deal with harassment, discrimination and bullying in the work area.

## **Personal information**

We respect the privacy of our employees, business partners and other stakeholders. We are committed to the protection of personal data in compliance with the data protection laws and regulations.

## **Examples of what is expected**

- Act immediately if you see unsafe actions (performed by our own employee or subcontractor) by stopping the action, discussing with the party performing the unsafe action and mutually agreeing on next, safe steps to go forward
- Always follow safety rules of Endomines and wear appropriate personal protective equipment

# Endomines

-Always report positive and negative safety observations or safety behaviour observations

-Always report cases of harassment, discrimination and bullying to the whistleblowing channel

-Keep personal data confidential and process personal data only when we have lawful reason to do so

## **Examples of what never to do**

-During recruitment, the selection cannot be based on gender, ethnicity, colour, age, race, religious belief, national origin, sexual orientation, marital status, disability, trade union activity or any other status protected by law or regulation.

-Never consume during working hours or come to work under influence of alcohol, drugs or medication that may affect ability to work

-Never hire a subcontractor who does not conduct business following similar human rights principles than Endomines. If you are unsure, then raise the issue for open discussion.

## **FOR THE PLANET**

### **ESG**

At Endomines we are committed to operate responsibly. We integrate Environmental, Social and Governance (ESG) considerations across all our operations. We believe that development work in the field of ESG is the most successful way to develop the company. We are committed to follow below principles when making daily business decisions.

- Ensure a safe and good place to work for our employees and contractors
- Ensure a good place to live for future generations
- Be an active partner in local community and support local businesses
- Respect our partners and stakeholders
- Ensure we have a financially sustainable business

We recognize the impact of our operations to the environment. We strive to minimize the adverse impact and to develop solutions that protect the soil, water, air, and biodiversity. We commit to comply with environmental legislation and aim always to outperform demands set by the legislation.

### **Examples of what is expected**

- Always evaluate environmental impact and minimize the impact of our work as much as possible
- Report any incidents that have impacted the environment

### **Examples of what never to do**

- Never perform work that is not allowed by our environmental permit
- Never commence work without evaluating environmental effects
- Never ignore an incident with environmental effects



## **HOW WE CONDUCT BUSINESS**

### **Compliance with Laws**

Endomines will comply with the laws, regulations and practices of each country in which it conducts its business.

### **Corruption and Bribery**

Under no circumstances will any employee or partner of Endomines engage in any conduct which may constitute or may be perceived to constitute (whether directly or indirectly), the giving or receipt of bribes, facilitation payments, inducements, commissions, or other improper benefits, whether or not such conduct in fact has the purpose of furthering a person's own, or the Company's, interests.

Our relationships with suppliers and other business partners shall not be influenced by the offer or acceptance of gifts or hospitality. Gifts and hospitality can be seen as a way to unfairly gain business advantage. No money, inappropriate gifts or hospitality should be offered or accepted. Having a legitimate business lunch or occasional legitimate business dinner is not prohibited. Should you be unsure if a gift, entertainment, or hospitality is inappropriate, then please contact a member of the management team or HR professional for advice.

### **Fair competition**

We commit to comply with competition and antitrust laws and value fair competition. We respect rights that other parties have for intellectual property. We also respect confidential information and do not exchange confidential or sensitive information that we have received without proper permission.

### **Conflict of Interest**

A conflict of interest arises when personal interests conflict with the interest of Endomines. This could arise by many ways, for example when an employee has interest, ownership or board membership in a private company related to work, when employee has an intimate relationship with an employee who can influence your salary or when an employee has an intimate relationship with a representative of a business partner of Endomines. The starting point should always be to act in a best interest of Endomines.

We are committed to conduct business ethically and work to avoid conflicts of interest. We must be transparent when conflict of interest situation arises and remove ourselves from the decision-making process when a conflict exists or can be perceived to exist.

### **Suppliers and business partners**

We treat our suppliers and business partners ethically and with respect. We operate with partners that comply with laws, regulations and who share similar principles than described in our Code. We expect our suppliers and other business partners to follow our Code and share our commitment on safety and ESG.

As stated in our ESG principles, we prioritise purchasing from local suppliers. This enables us to build a partnership network that supports the areas where we operate and lowers our risks related to supply chain disturbances.

### **Insider trading**

Some of Endomines employees will become aware of information which could influence investment decision on Endomines shares. Employees are forbidden to use confidential or insider information (information that is not publicly disclosed and could influence price of the share when made available) for personal advantage or to share this information with others for similar purpose.

**Tax**

Endomines is committed to comply with relevant tax laws and to pay the correct amount of tax in the countries we operate. Our commitment to comply includes a zero-tolerance towards tax evasion.

**Examples of what is expected**

- Always consider if accepting or giving a gift or hospitality is appropriate. If unsure, then please ask from a management team member, HR professional or CEO
- Always report items that may be perceived as a bribe or conflict of interest
- Always remove yourself from the decision-making process when a conflict of interest exists or can be perceived to exist.
- Always keep insider information confidential
- Prefer local suppliers, when this is reasonable

**Examples of what never to do**

- Never offer gift or hospitality to gain business advantage
- Never hide or fail to disclose actual, potential or perceived conflict of interest
- Never trade Endomines shares when aware of insider information



## **How to act, if you see actions in breach of the Code of Conduct?**

If you notice behaviour or actions that conflict with the Endomines Code of Conduct, you have the responsibility to bring this to the attention of Endomines. Please use the way of reporting which feels the most comfortable to you.

Reporting can be done by:

- Contacting your line manager or a member of the Management Team
- Contacting the CEO or external HR professional
- Reporting this to the Whistleblowing reporting tool (anonymous)

**All reports are handled confidentially.**