

A Guide to the **Kinross Code of Conduct**

Working with Integrity



Our Values Drive Our Behaviour

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Purpose

The Kinross Code of Business Conduct and Ethics (the “Code”) outlines the actions and forms of behaviour that all of us must follow to globally uphold our Company’s values and principles and comply with the law.

This Guide, developed for you, is intended to provide the assistance that you need to handle most daily work situations in a manner that upholds our Code.

The Guide provides an overview of the basic values and standards that all employees, officers and directors must follow. It also includes frequently asked questions about the Code and how it is applied.

This Guide has been designed to support your day-to-day work at Kinross and your understanding of the Code, but is not intended to be a comprehensive guide of all responsibilities under the law that apply to your role at Kinross.

Throughout this Guide, you will see references to the “Code”. This refers to our Code of Business Conduct and Ethics. The Code is continuously updated to reflect changes in laws, policies and best practices. The most recent version of our Code is available on our website at kinross.com/about/governance/

UNDERSTANDING THE CODE

Who Needs to Follow the Code?

All of us. The Code applies to all Kinross employees (regular, occasional, temporary, contractual, part-time, etc.), consultants, officers and members of the Board of Directors of Kinross worldwide (referred to herein as “you”, “we”, “us” or “our people”).

Q+A

Q: Does the Code only apply to employees in certain locations or at certain levels of the Company?

A: The Code applies equally to all our people regardless of location or job level at Kinross.

Q+A

Q: Is the Code applicable to third parties if they are not employees of Kinross?

A: Yes. Kinross has the same compliance expectations for third parties we do business with. We make reasonable efforts to make them aware of our expectations under the Code and expect them to comply with our Code or have in place similar practices and principles.

Third-party suppliers to Kinross also need to adhere to a special Kinross Supplier Standards of Conduct in order to do business with the Company.

The Values that Guide Us

The four Kinross Values:

Putting People First
Outstanding Corporate Citizenship
High Performance Culture
Rigorous Financial Discipline

Our values are our guiding principles. These people-focused values shape our culture, inform how we work and guide us in managing the opportunities and responsibilities that come with being a global mining company in the 21st Century.

Alongside Kinross' values, the Code also reflects fundamental principles and behaviours that we are all expected to live by:

Respect and Dignity

Honesty

Compliance with the Law

Equality

Professionalism

Accountability

Fairness

YOUR RESPONSIBILITIES

Adhere to the Code

You have a personal responsibility for ensuring our business conduct is carried out in a legal, fair, honest and ethical manner.

Whether you are a director, officer, or an employee of a Kinross company, or an individual contractor working for Kinross, you are required to read, understand and follow the Code. While you are not expected to know the exact details of all the laws applicable to Kinross' business globally, you are expected to understand the Code and how it impacts your work at Kinross, to recognize potential risks, and to know when to seek advice.

Beyond reading this Guide, you are responsible for reviewing and understanding the Code. If in doubt about any issue, you are responsible for discussing the issue with your direct manager, or seeking guidance from the Kinross Legal and Compliance Team in your region or at the corporate office ("Kinross Legal") for any further guidance.



Q: What should you do if the Code contradicts the customs and values of the region where Kinross operates?

A: Always follow the Code and contact Kinross Legal for further guidance before any action is taken.

Comply with the Law

In addition to the Code, Kinross expects everyone conducting work for Kinross to comply with all laws and regulations applicable to their work.

Any violation or attempt to violate applicable laws of any countries where Kinross operates may lead to disciplinary measures (up to and including termination) and civil or criminal liability for Kinross and for any person involved with, or with knowledge of, such violation.



Q: How should you act if you are working in a region where local laws contradict the Code or any other Kinross policy?

A: Should local laws or regulations in the jurisdictions where we operate allow behaviour that is not compliant with our Code, the Code prevails.

REMEMBER

Complying with the Code and all applicable laws are conditions of employment.



YOUR RESPONSIBILITY

You are individually responsible for:

Complying with the Code and completing annual certification as applicable;

Being aware of the laws in the jurisdiction applicable to your individual work scope;

Reporting any breach, or suspected breach, of the Code or its underlying policies;

Fully co-operating with investigations when required;

Acting with integrity at all times so as to protect and promote the reputation of Kinross.

If you are unsure about your responsibilities under the Code in a particular situation, always ask first. Your manager or Kinross Legal are always available to provide you with appropriate guidance.



YOUR RESPONSIBILITIES

Report Suspected Violations

If you have concerns about suspected violations of the Code, you can call or email the Kinross Integrity Hotline. Your report will be taken seriously and investigated.

Suspected violations can be reported in a variety of ways:

- Verbally, in-person or by telephone
- Email
- Online at <http://whistleblowerreporting.kinross.com/>
- Mail or Courier

You can report a concern to the Kinross Integrity Hotline 24 hours a day, seven days a week, and 365 days a year. EthicsPoint is our external service provider and your confidentiality is assured. Suspected violations can also be reported anonymously.

For information on accessing the Kinross Integrity Hotline and the website address for submitting web-based complaints, see [Duty to Report](#) in [Reporting Violations and Corrective Actions](#) (pages 33-36).



Q: What should you do if you become aware of misconduct in your area? How certain should you be before making a report?

A: It is unnecessary for you to collect more information or conduct an investigation if you become aware of any actual or suspected misconduct. You should immediately report what you know to your manager and/or Kinross Legal or otherwise in accordance with the Kinross Whistleblower Policy (see page 33). Our Whistleblower Policy specifies Kinross' procedures to properly investigate these matters.



MAKING THE RIGHT DECISION

Ethical Conduct



Making the right decision starts with common sense and ethical judgment. You should always ask a number of questions before taking any action at your job that you are unsure about.

For instance:

Could my conduct affect someone's life, safety or health?

Does it feel ethical, moral and honest?

Is the action legal?

Could someone perceive this action as a conflict of interest?

How would I advise a friend if they were in the same situation?

Would this action compromise trust or integrity?

How would this action look if it was reported in the news?

Could it affect my or Kinross' reputation negatively?



YOUR RESPONSIBILITY

If you are unsure about your responsibility under the Code or about what to do in a particular situation, always first seek advice from your manager, a more senior colleague or Kinross Legal. Kinross will not penalize anyone for providing any information in good faith relating to any activity that they honestly believe is contrary to the Code or might be illegal.

Fraud

Kinross does not tolerate any acts of “fraud” against or involving Kinross, our people or any third party in a business relationship with Kinross. Examples of fraud include:

Theft of funds, securities, supplies or other assets;

Improper handling or reporting of monetary or financial transactions;

Profiting from insider knowledge of Kinross activities;

Disclosing to unauthorized third parties any of Kinross’ confidential information;

Accepting or seeking anything of value from suppliers or other parties in a business relationship with Kinross except as permitted by the Code; or

Destruction, removal or inappropriate use of Kinross business records, furniture, fixtures and equipment.

YOUR RESPONSIBILITY

Never engage in any form of fraudulent activities in the course of your work.

Always ensure that Kinross’ assets and resources are only used for legitimate business purposes.



Q: What should you do if your manager asks you to process an invoice that does not pertain to Company business?

A: You must not process this invoice. This is a fraudulent act and a direct breach of the Code. The request from your manager should be reported to the Kinross Integrity Hotline or to Kinross Legal.



MAKING THE RIGHT DECISION

Avoiding Conflicts of Interest

A conflict of interest arises when you are asked to make a decision or act in a certain way for Kinross but simultaneously have a personal interest (direct/indirect and real/perceived) in the outcome of such decision or act.

Examples of conflict of interest:

Conducting business with a third-party entity owned or controlled by a friend, family member or another Kinross employee;

A romantic relationship between a Kinross employee and a third party providing (or looking to provide) services to Kinross;

Receiving gifts, payments or other benefits from a third party before, during or after a contract tender, negotiation, or award; or

An employee acquiring property or a business interest in which they know that Kinross is interested in acquiring.



Q: Can you hire a firm if your cousin has a minority stake in this firm even if it is the best firm in the bid process?

A: No, this situation is a conflict of interest as your objectivity in making the selection in the bidding process cannot be guaranteed and you may have the desire to advance the interests of your family member. If your cousin's firm still wants to bid on the contract, you should disclose the conflict and cease involvement in the selection process.

Avoiding Conflicts of Interest



Q: Do you need to disclose a romantic relationship with a co-worker or supervisor?

A: Your romantic relationships are a personal matter. However, when relationships have the potential to lead to a conflict of interest or perceived conflict, you should disclose it to the appropriate manager. Every effort will be made to address sensitive matters with respect and discretion.

YOUR RESPONSIBILITY

You must always disclose in writing any real or apparent conflict of interest to your most senior manager and Kinross Legal, and document the disclosure. If you have a conflict of interest, you should not continue to participate in any decision or act until it has been approved by management or Kinross Legal.



REMEMBER

A conflict of interest may occur even if you believe that you are capable of making an objective decision or performing a task without being influenced.

However, situations involving potential conflicts of interest are not uncommon in business. Such situations can be acceptable if they are disclosed in advance and approved by Kinross.

MAKING THE RIGHT DECISION

Anti-Bribery and Corruption Compliance

Kinross strictly prohibits bribery and corruption in all its forms. We must not directly or indirectly accept, offer, promise, grant, or authorize the giving of any bribe, kickback or anything of value to any third party, including government officials, in exchange for benefit or advantage that Kinross would not otherwise be entitled to.

“Anything of value” includes any payment of money (including reimbursements), allowances, loans, excessive gifts or entertainment, gratuities, donations, preferential hiring of employees or suppliers, or providing any other benefit of any kind. There is no minimum threshold of value for these types of improper payments or benefits.



YOUR RESPONSIBILITY

As an employee or contractor working on Kinross’ behalf, you must never engage in or condone acts of corruption or bribery, even if this leads to additional costs for Kinross.

Payments made in the ordinary course of business in satisfaction of a clear, written, legal requirement are permissible (e.g., permits/licence fees, royalties, taxes).

The Code provides detailed guidance on this subject, and you are expected to be aware of and be in compliance with these policies at all times.



REMEMBER

Bribery and corruption are illegal in all countries where Kinross operates and can result in both Kinross and our people becoming subject to fines and criminal penalties, including jail time, serious reputational damage, and a loss of our license to operate.

Government Officials

We regularly interact with government officials around the world.

A government official is:

Any legislative, judicial or administrative official (regardless of level), employee or other representative of any government, or any of its ministries, departments or other government entities (including any state-owned or controlled company or other entity), indigenous groups/tribes, any other government-like entity or public international organization or political party, or a candidate for political office.

We must exercise particular care when offering any business courtesy to government officials, as they are subject to stricter rules and laws.



YOUR RESPONSIBILITY

Employees who deal with government officials are responsible for knowing and adhering to the laws and regulations that apply to such interactions. In particular, you must:

Never offer anything to a government official unless it is clearly permissible and fully compliant with our Code and the Anti-Corruption Compliance Protocol;

Never hire government officials or their relatives or friends without consulting Kinross Legal;

Never give anything of value to a third party that you believe could be passed on to a government official.



Q: Kinross has applied with a government entity for an exploration permit, and has yet to hear back after multiple delays, which is costing the Company thousands of dollars. The government official in charge of issuing the permit has made comments to the effect that the permit would be issued sooner if the Company hires his cousin. Can Kinross hire the official's cousin in the hope that it speeds up the permitting process?

A: Definitely not. Kinross hiring the government official's cousin is a bribe as Kinross would be receiving a benefit in return for granting something of value (the job).

MAKING THE RIGHT DECISION

Gifts and Entertainment

Gift-giving customs differ throughout the world BUT the exchange of gifts must never compromise (or appear to compromise) your ability to make objective and fair business decisions.

Receiving occasional gifts, meals or entertainment is acceptable if unsolicited and reasonable in value, and compliant with the law and our Code. Gifts should only be accepted by you if they would be considered reasonable and customary for your position with Kinross.

All gifts, meals or entertainment provided by you to third parties must be completely and accurately recorded in the books and records of Kinross.

Q+A

Q: What are examples of gifts and entertainment that are acceptable?

A: Business lunches, the exchange of minor items between business associates, or the presentation of small tokens of appreciation at business or public functions will likely be acceptable. Entertainment should, however, be reasonable and never lead to a sense of obligation.

Gifts and Entertainment

Receiving a gift or entertainment might be acceptable when:

Receiving or giving the benefit creates (or appears to create) no obligation to return the benefit.

The gift or entertainment occurs infrequently.

The value of the benefit should be reasonable. As this threshold depends on the region where you operate, contact Kinross Legal in your region for more details.

The gift or entertainment is ordinary in the business practice or industry for building business relationships.

The gift or entertainment does not violate any law or contravene the policies of the recipient's organization.



Q: What should you do if someone sends you a gift to influence your ability to make an objective decision?

A: Inform your manager and the Kinross Legal and Compliance Team in your region or at the corporate office, who will advise you on appropriate next steps. Subject to that advice, inappropriate gifts should be returned. Perishable gifts can also be donated to charity. In either case, the giver of the gift should then be notified as advised by Kinross Legal.

YOUR RESPONSIBILITY

Never ask for a gift or favour from anyone.

Never accept or offer cash.

Never exchange any gifts during a contract tender, negotiation or award.

Always record any gifts made with Kinross resources accurately and transparently in our records.

These guidelines apply to all your family as well.



MAKING THE RIGHT DECISION

Competing Fairly

Competition or Antitrust laws ensure fair competition in business for products and services.

These rules prohibit any agreement that will restrict competition or trade, or supports unfair practices or the abuse of economic power, such as agreements between competitors regarding bidding, production, price, supply and customer practices.

Kinross firmly believes that fair competition is fundamental to free enterprise. Kinross does not engage in anti-competitive activities, and always competes for business ethically, robustly and in compliance with the Code and applicable laws, including any and all antitrust and competition laws. Kinross expects everyone who does business with us to do the same.



YOUR RESPONSIBILITY

Never discuss any production intentions, future plans, or confidential supplier information, etc. with anyone outside Kinross, especially with any suppliers or competitors.



Q: What are some types of behaviour that would be anti-competitive?

A: Behaviour that is prohibited includes discussions, collusion or agreements to:

Fix or control prices;

Restrict competition between suppliers; or

Not submit a bid, withdraw a bid or submit an artificial bid in order to mislead or create an unfair bidding process.



Money Laundering



Money laundering is the process by which money obtained by unlawful activities infiltrates the world of legal finance and business in order to hide the money's origin.

Kinross must ensure that its operations are not used by others to bring funds generated by illegal activities into legitimate commerce. We must act diligently to ensure Kinross is never used or involved in money laundering or other forms of criminal activity.



YOUR RESPONSIBILITY

Together, we must be alert and recognize any potential warning signals that indicate unusual or suspicious activity, and report immediately any doubtful activity that may involve money laundering.

MAKING THE RIGHT DECISION

Use of Company Assets

Every Kinross employee shares responsibility for protecting Kinross assets. We must protect Kinross property and use it properly and for legitimate business purposes.

It is important that you maintain, reasonably protect and ensure that you can account for all Company property assigned to you.

Q+A

Q: A Kinross employee reads personal emails at work after regular hours that some may find obscene and forwards them to other Kinross employees. The employee believes this is acceptable because he is not harming Kinross since he is doing this after hours and is not disturbing anyone. Is that correct?

A: No. It is never acceptable to use Kinross' network or computer to view or forward inappropriate emails, even if it is done after hours, or even at home or on business trips. This employee should not expect any privacy in regards to sending such emails or viewing the Internet using Kinross equipment.

Use of Company Assets



YOUR RESPONSIBILITY

Do not use Kinross property for personal profit (or that of any family member) or for any unlawful or unauthorized personal or unethical purpose.

Do not intentionally damage or destroy the property of Kinross or any other person, or commit theft of such property.

Do not excessively use Company assets (i.e., email, phones, computers, Internet, vehicles, etc.) for personal use, unless authorized by your manager.

Keep your work passwords confidential in the same manner you would your own banking details and personal passwords.



Q: Can you use your Kinross phone to sometimes call family?

A: Yes, Kinross assets should mainly be used for work but minor personal use is allowed, provided that such use is in compliance with the Code and other Kinross policies.



Q: Can you use colour photocopiers for personal and family documents?

A: Kinross photocopiers should be used for work purposes, and only minor personal use is allowed.

MAKING THE RIGHT DECISION

Third-Party Compliance

A “third party” is any individual or organization that we do business with. Third parties typically include suppliers, vendors, joint venture partners, consultants, government officials or any party that acts on behalf of Kinross.



YOUR RESPONSIBILITY

Kinross strives to deal only with third parties that share our commitment to ethics and compliance.

We therefore expect these third parties to comply with our Code. If you are required to engage with third parties on Kinross’ behalf as part of your job, it is your responsibility to:

Always take reasonable measures, including conducting proper due diligence and background checks on third parties, to ensure they are legitimate and legal before engaging in business with that company or person.

Always ensure that the Kinross Supplier Standards of Conduct and other appropriate compliance requirements for third parties are included in all contracts.

Never work with third parties that engage in any form of unethical, corrupt or other potentially illegal activity, or which have not adopted appropriate policies and procedures requiring ethical conduct and anti-corruption compliance.

Always provide oversight on the activities carried out by third parties.

If you are unsure about or are suspicious of any activity of a third party, please immediately contact Kinross Legal before doing anything further.



Intellectual Property, Information Technology and Confidentiality

INTELLECTUAL PROPERTY

All intellectual property developed by a Kinross employee during their employment with Kinross, whether developed at work or not, is property of Kinross and will remain so following the employee leaving the Company or any termination of the relationship with the employee.

CONFIDENTIAL INFORMATION

Confidential Information includes business, financial, technical, legal, proprietary, supplier, customer, and personal information that is not publicly available.

We must safeguard Kinross' Confidential Information and must ensure we do not disclose to any person (including any family members), or entity, any Confidential Information or other information that might harm Kinross' reputation.

We must comply with applicable Kinross policies and all laws relating to confidential and material undisclosed information and rules regarding securities trading. This information must not be disclosed except as expressly permitted by policies and laws.

Please refer to our Disclosure, Confidentiality and Insider Trading Policy for further details and contact a member of Kinross Legal if you are unsure whether information is Confidential Information and, if so, if there are restrictions on its use and disclosure.

WHAT IS INTELLECTUAL PROPERTY?

Intellectual Property includes inventions, computer programs, research methods, technical processes, reports or articles, and any other form of innovation or development, including any material protected by patents, trademarks or copyrights.



INFORMATION TECHNOLOGY

While Kinross will take reasonable precautions to protect the confidentiality of Kinross information technology, Kinross reserves the right to monitor and inspect such use as may be necessary for business purposes. Accordingly, you should have no expectation of privacy when using information technology at Kinross.

If you use your personal electronic device, rather than a Kinross-issued device, to access Kinross email, other information technology or Confidential Information, that access will be subject to compliance with the Code (including Kinross' monitoring and inspection rights) and other Kinross policies. Any copies of Kinross' Confidential Information (or other Company documents or data) on personal electronic devices remain the property of Kinross.

MAKING THE RIGHT DECISION

Intellectual Property, Information Technology and Confidentiality

EMAIL AND INTERNET

Kinross provides email and the Internet to employees and staff in order to conduct business and enhance communication among employees. We must take reasonable care to protect Kinross systems, information and reputation. Kinross networks and email should be used primarily for Kinross business even if occasional personal use is permitted. You should have no expectation of privacy when using Kinross email and computers, and should understand that such communications and activity are not private even if not business-related.

SOCIAL MEDIA

If on any social media site you identify yourself as a Kinross employee, or in any other way indicate a connection with Kinross, all communications must be conducted in the same manner as is required in our workplace and the conduct of our business. You also must not disclose any confidential or material information about Kinross on any social media sites.



Q: You are unhappy at work and feel your complaints are not being heard. Can you post about it on social media?

A: These are personal and confidential matters and should not be shared publicly on social media sites. Please contact the Kinross Integrity Hotline or Kinross Legal and Compliance Team in your region or at the corporate office if you feel your complaints at work are not being properly addressed by your managers.



Q: You see a negative post about Kinross on a social media site. Can you respond to this post?

A: If you identify yourself as a Kinross employee, or indicate a connection with Kinross, communications should be conducted in the same manner as is required in the workplace and in compliance with the Kinross Disclosure, Confidentiality and Insider Trading Policy. You cannot speak on behalf of the Company. In general, when posting messages on social media, you must apply the same values and ethics that are expected of Kinross employees, whether you are on Facebook or speaking to a colleague face-to-face.

PERSONAL INFORMATION

Kinross collects, uses and stores personal information about its employees, contractors, customers, suppliers, associates and others in the course of its business activities. While Kinross endeavours to limit the collection of personal information to what is necessary or appropriate, activities on Kinross systems – including email, voice mail, the Internet, computers, etc. – are monitored to ensure acceptable use.



YOUR RESPONSIBILITY

Take reasonable care to protect Kinross systems, information and reputation through your use of email.

Refrain from disclosing information or commenting on the affairs of fellow employees or the Company in any way, including through social media.

Respect and protect the confidentiality of Kinross and its employees at all times.



Q+A

Q: You just heard about an operational matter that may affect production at your site. Can you post about it on Facebook?

A: No. Employees are expected to behave in a manner that supports and protects the confidentiality and reputation of Kinross. Disclosing information or commenting on Kinross' business or the activities of your co-workers is not acceptable under the Code.

MAKING THE RIGHT DECISION

Accounting Practices and Records Retention

Kinross requires that all accounting and financial reporting comply with applicable laws and relevant accounting principles, rules and other regulations.

Employees who make entries into business records or reports must ensure that all information is presented fairly and in a truthful, accurate and timely manner. You should never use or authorize accounting practices that may distort our financial reporting, operating results or performance measures.



Q: You have access to Kinross systems allowing you to update order information. Your manager would like you to accelerate shipment dates in the system so that it looks like they were shipped in December instead of January in order to boost December sales. Can you do this?

A: No. Accurate shipping dates are an important part of ensuring the accuracy of Kinross financial statements. False entries should never be made in Company records, even if this makes our financial results look better. If the request persists, contact your manager's supervisor, Kinross Legal or report your concerns in accordance with the Whistleblower Policy.





Q+A

Q: What should I do with Kinross records if I leave the Company or am reassigned to another role?

A: Remember that the records are Kinross property. They should be turned over to your immediate manager.



YOUR RESPONSIBILITY

Always accurately record all assets, liabilities, revenues and expenses.

Always follow all internal control procedures.

Never make false or artificial data entries.

Never establish unsupported mineral reserves or mineral resources.

Always report any knowledge of questionable financial transactions or non-compliance with our financial controls in accordance with the Whistleblower Policy.

RECORDS RETENTION

It is critical that Kinross properly maintains its records by following all applicable Kinross policies, laws and regulations regarding the retention of business records. Kinross prohibits the destruction of any records other than in accordance with our Records Retention Policy.

MAKING THE RIGHT DECISION

Harassment and Discrimination

Kinross maintains an inclusive work environment where all employees feel safe and are valued for the diversity they bring to the Company. We believe in the principle that all individuals should have an equal opportunity to achieve their full potential at Kinross. **Kinross does not tolerate any form of discrimination, harassment or workplace violence.**

We are committed to actions and policies to assure fair employment, including equal treatment in hiring, promotion, training, compensation, termination and corrective action.

Q+A

Q: You have witnessed a colleague of yours repeatedly make fun of and taunt a Kinross contractor. While you do not like the situation, you do not think it is your place to report any of this and that the contractor would raise the issue if he/she is uncomfortable. Is that correct?

A: No, you should be reporting this form of harassment to your supervisor or manager. Your colleague's behaviour appears to be a form of bullying, and has been done repeatedly. Any form of harassment by a Kinross employee, whether directed at another employee, contractor, or any other non-Kinross individual, must be reported immediately and is a violation of our Code.



Harassment and Discrimination

DISCRIMINATION

Discrimination is prohibited on the basis of race, colour, religion, gender, national origin, age, sexual orientation or disability or any other category protected by Canadian federal and provincial laws, applicable human rights legislation and all other applicable laws and regulations in the jurisdiction where Kinross employees are located.



YOUR RESPONSIBILITY

Always be respectful, courteous and professional with other Kinross employees, contractors, suppliers and all other members of the outside community.

You must report any incidents of discrimination, harassment and workplace violence of which you become aware.



Q: An employee has been working for Kinross for many years and has never been promoted, even though most of his co-workers have been. Is this discrimination?

A: No, not necessarily. Promotions are based on performance, availability and opportunities, and an inability to obtain a desired promotion does not necessarily mean discrimination. An employee should meet with their Human Resources representative for feedback on the promotion process.





Health and Safety

We put the health and safety of our workforce above all other priorities. Accordingly, we believe no task is so urgent that it cannot be performed safely.

Our Health and Safety Policy and principles require that all employees and contractors are trained and competent to safely perform their work. By following our practices and procedures, we are all responsible for ensuring that workplace safety is placed above all other priorities and that incidents are reported, acknowledged and addressed.



YOUR RESPONSIBILITY

Adhere to Kinross' Health and Safety policy under all circumstances.

Always follow safety practices and procedures.

Never compromise on safety or pressure others to compromise to get the job done.

Be vigilant and report potential health and safety risks and violations.



Q: I noticed an unsafe practice, but I know that reporting this practice will slow down work and could cause both a financial and production loss. What should I do?

A: Safety is our number one priority. If you believe the practice is unsafe, you are responsible for reporting it, regardless of the effect on our business. Let your supervisor or appropriate manager know as soon as possible, or contact the Kinross Integrity Hotline.



Environment



We protect the environment by proactively managing the potential environmental risks associated with our operations, projects and exploration activities in compliance with the more stringent of local regulations or Kinross' Environmental Policy and management standards.



YOUR RESPONSIBILITY

Adhere to Kinross' Environmental Policy.

Always comply with applicable environmental laws and regulations.

Follow Kinross' management standards to reduce potential environmental risks.

Be aware and report any suspected or actual environmental violations.

Human Rights

We integrate human rights best practices into our worldwide business and decision-making processes.

Human rights are defined in the “International Bill of Human Rights”,¹ which has been adopted by the overwhelming majority of nations, including all countries where Kinross operates. Key human rights topics applicable to our industry include equality of economic opportunity, accessibility and accommodation, and compensation; freedom of association and collective bargaining; forced and child labour; security forces; clean water, air, and environmental health; and indigenous peoples’ rights.

While it is the duty of governments to protect human rights through the establishment and enforcement of appropriate laws, it is our duty as a company to respect and uphold those rights. For us, this means understanding the ways our activities, and those of suppliers to Kinross, could adversely impact human rights of others, and taking reasonable measures to avoid, reduce and/or address those risks.

Grievances pertaining to any potential, suspected, or actual, violations of human rights should be reported through the Kinross Integrity Hotline.

¹ Including the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social, and Cultural Rights.



Q: I recently discovered that a contractor is providing inadequate accommodation for their people when working for Kinross. What should I do?

A: We expect all suppliers to Kinross to respect and uphold our expectations regarding human rights as supported by the Code and our Supplier Standards of Conduct. If you suspect our expectations are not being met, inform your manager or report your concerns through the confidential Kinross Integrity Hotline.



Donations and Sponsorships

Kinross is committed to making a positive contribution to host communities and their sustainable development.

We do this through providing meaningful job opportunities, generating business opportunities for local suppliers, and paying taxes. We also engage in sponsorships and donations in areas of strategic focus for Kinross. These areas are:

Health – including hospitals, children’s health and public health.

Environment – including sustainability and alternative energy programs.

Education – including skills and vocational training programs relevant to the mining industry.

Local Development – including programs in support of, and aligned with, local community development plans. Such programs may cover entrepreneurship and small business, arts and culture, and infrastructure.

Donations and sponsorships may present corruption risk. As such, all donations, including political donations (which are not an area of focus for the Company) and sponsorships should be administered in accordance with the Donations and Sponsorship Policy.



Q: What should I do if someone approaches me asking Kinross to make a donation to their organization?

A: Each site has a donations committee that reviews donations and sponsorship requests. You should redirect requests for donations to the committee. While none of Kinross’ policies apply to what donations you might want to make as an individual, when it comes to donations of Company resources (including in-kind contributions), the Donations and Sponsorship Policy governs.



Q: My family donates to a wide range of charitable and political organizations. Does this mean I may be in breach of the Code or putting the Company at risk?

A: No, you are not in breach of the Code. Personal donations are separate from your role in the Company and do not reflect the views of, or benefit, the Company in any way.

Duty to Report

If you know of, or suspect, any form of unethical or illegal behaviour, or violation of the Code, you are responsible for reporting the issue as described below. Kinross takes every reported Code violation and other violations of policy or law extremely seriously, and will treat all reports with care and good faith.

What do you do if you become aware of an actual or suspected violation?

In accordance with the Whistleblower Policy, report the violation:

1. To your direct manager, a member of senior management, a member of Kinross Legal or the Vice-President of Compliance; or
2. Through the Kinross Integrity Hotline, using one of the alternative channels set out in the Whistleblower Policy.

Any issue that is raised or reported will be treated seriously and confidentially, and the reporting employee will be protected from any form of retaliation or discrimination. Kinross prohibits reprisals in any form against an individual that has reported in good faith a violation of the Code or its underlying policies and principles, or any applicable laws, rules or regulations. Any retaliation must also be reported.

WHISTLEBLOWER POLICY

Under our Whistleblower Policy, you can report concerns regarding actual or suspected violations of the Code or other improper activities without fear of retaliation. If for any reason you feel you cannot speak to your manager or leader, you can speak to Kinross Legal, Human Resources, Internal Audit, your country manager or call the Kinross Integrity Hotline.

REPORTING VIOLATIONS AND CORRECTIVE ACTIONS

How to Report

If you suspect a violation of the Code, there are three ways to submit a report.

Reports can be made using EthicsPoint, a confidential, third-party provider.

These include:



Online at <http://whistleblowerreporting.kinross.com/>.
Select your language and click on "File a new report".



Toll-free telephone using Kinross' Integrity Hotline. An EthicsPoint operator will assist you with submitting your report.

You can also send a confidential, written report:



By mail send your report in a sealed envelope marked **Private and Confidential** to:

Chief Compliance Officer
Kinross Gold Corporation
25 York Street, 17th Floor
Toronto, Ontario, Canada
M5J 2V5

To be opened by the Chief Compliance Officer only,
being submitted pursuant to the Whistleblower Policy.

REPORTING VIOLATIONS AND CORRECTIVE ACTIONS

How to Report

KINROSS INTEGRITY HOTLINE

The toll-free numbers below provide direct dial access to the Kinross Integrity Hotline based on caller location.

These are toll-free numbers and there is no need to dial “1” before dialing the number.

The language of the answering EthicsPoint operator is the primary language of the country you are calling from. To continue your call in another language, please state your language to request an interpreter. It may take 10 to 15 minutes to arrange for an interpreter. During this time, please do not hang up.

North America

Canada (866) 816-4648

Canada (855) 350-9393 (French)

U.S.A. (866) 816-4648

South America

Brazil 0-800-891-1667

Chile 1230-020-5771

Russia 8-10-8002-6053011

Spain 900-991-498

West Africa

Ghana

1. Dial the AT&T Direct Dial Access®:
0-2424-26-004

2. At the prompt dial (866) 816-4648

Mauritania

Please place a reverse charge call:

1. From an outside line contact
your local operator.

2. Request a reverse charge or collect call
to be placed to the United States to
(503) 619-1806.

3. When the operator asks who is placing
the call, give your company name.
Do not give your name.

4. All reverse charge or collect calls
will be accepted by the EthicsPoint
Contact Center.

Contact Kinross' Legal and Compliance Team at your site if you are unable to submit a report online or if the toll-free number provided above is not working.

REPORTING VIOLATIONS AND CORRECTIVE ACTIONS

Corrective Actions

Any breach of the Code must be addressed by some form of corrective action.

Depending on the type of violation, Kinross Legal (and/or other functional group) might investigate and recommend a form of corrective action to management. Investigations are conducted with the utmost respect, discretion and privacy. Management ultimately has the responsibility to determine the appropriate and adequate corrective action, and to implement the action in due course.

The following corrective actions might be appropriate, depending on the type of violation:

- Discontinue activity;
- Reassignment of functions;
- Disciplinary measures, up to and including termination and loss of job;
- Changes to internal controls and processes.

We are all expected to support and co-operate with any investigation. We must not hinder or obstruct any investigation, failing which may lead to disciplinary measures, including dismissal.

Our Values Drive Our Behaviour



The four Kinross Values:

Putting People First

Outstanding Corporate
Citizenship

High Performance Culture

Rigorous Financial
Discipline



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