

# Ethical Conduct


**KINROSS**

SUSTAINABILITY

## Our Responsibility

As a responsible mining company and a member of civil society, our business depends upon a fundamental commitment to ethical conduct. It is our responsibility to adhere to the highest standards of ethical behaviour and business conduct across our Company and, we expect those with whom we do business, to do the same. In turn, our stakeholders expect Kinross, our management, employees, partners and contractors, to act ethically and transparently, in compliance with all applicable laws, in every part of our business and in every jurisdiction around the world where we have a presence.

## Our Commitment

The [Kinross Code of Business Conduct and Ethics](#) (“the Code”) sets out the principles of conduct and ethics to be followed by all Kinross representatives including, among other things, the expectations to promote honest and ethical conduct, promote and foster a culture of compliance with applicable laws, to create a work environment in which all individuals are treated with respect and dignity, to avoid conflicts of interest and resolve them transparently when they occur, and to deal ethically with government officials.

Alongside the Code, Kinross’ four core values, the [Safety and Sustainability Policy](#), Supply Chain Policy, Government Relations guidelines and Whistleblower Policy are also part of a unified framework for all of our employees across our global operations which sets forth clear expectations of ethical and responsible behaviour.

We also rely upon the Kinross Supplier Code of Conduct which conveys the Company’s expectations that our suppliers, among other things, must comply with the Code, including anti-corruption laws. To learn more, see [Supply Chain](#).

## Our Approach

The Code addresses a broad range of ethical and business conduct issues including:

- workplace conduct, in particular harassment and discrimination
- corporate responsibility, covering, health and safety, environment, and human rights
- third-party relationships and conflicts of interest
- fraud
- anti-bribery and corruption compliance
- money laundering
- fair competition
- legal compliance
- confidentiality
- the use of Kinross assets and intellectual property
- donations and gifts, including political contributions
- procedures for reporting violations

Importantly, the Code expressly prohibits corruption, including participation in bribes, kickbacks or improper inducements or payments to any public official.

The Code also articulates our respect for human rights by prohibiting any kind of discrimination or harassment in the workplace at Company-related events or through electronic/digital media.

To support compliance with the Code across the Company, we require the following:

- Quarterly sign-off on the Core Policies for all members of Kinross' Senior Leadership Team and their reports, and all other management level personnel (director-level and above),
- Sign-off on the Code by every new employee upon onboarding
- Annual sign-off on the Code by management (Director-level and above) in all jurisdictions to acknowledge that they have read and understood, have not violated, and are not aware of any violations of the Code
- Employee participation in ongoing training and education programs to maintain awareness and understanding of the Code
- Strict prohibitions on corrupt activity and robust controls to mitigate the risks of non-compliance

Kinross' Vice-President, Compliance provides dedicated leadership and oversight of the Company's global compliance with the Code and other core policies, including the management of the Whistleblower Policy, and reports quarterly to the Corporate Governance and

Nominating Committee and Audit and Risk Committee of the Board of Directors. The Code sign-off process across our global operations is managed by Kinross Human Resources.

The Code is available in all six languages spoken by Kinross' employees.

Our [Whistleblower Policy](#) provides employees and non-employees with mechanisms to seek advice about ethical and lawful behaviour, organizational integrity and to confidentially report actual or suspected improper activities regarding the Company's accounting, internal controls or auditing matters, and any other violations of the Code including, but not limited to, violations of applicable laws and other Kinross policies. Enquiries can be made by traditional mail, submitted online, or by use of a dedicated 24-hour "Integrity Hotline".



**To learn more about our ethical conduct and performance, see our most recent [Sustainability Report](#).**