

Ethical Conduct and Anti-Corruption



Our Responsibility

The success of our business depends upon a fundamental commitment to ethical conduct. It is our responsibility to adhere to high 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](#) (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 Policy and [Whistleblower Policy](#) are part of a unified framework for all our employees across our global operations which sets forth clear expectations of ethical and responsible behaviour.

We also rely upon the [Kinross Supplier Standards of Conduct](#) to convey the Company’s expectations that our suppliers, among other things, must comply with the Code or an equivalent set of principles, and anti-corruption laws and laws regarding modern slavery. To learn more, see [Supply Chain](#). Our commitment to act ethically and transparently is aligned with our conformance to the **World Gold Council’s Responsible Gold Mining Principles – Principle 1.**

Responsible Gold Mining Principles	
	1.1 Legal compliance
	1.2 Code of conduct
	1.3 Combating bribery and corruption
	1.4 Political contributions
	1.5 Transparency
	1.6 Taxes and transfer pricing
	1.7 Accountabilities and reporting

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 prohibits any kind of discrimination or harassment in the workplace at Company-related events or through electronic/digital media. The Code is available in the principle five languages spoken by Kinross’ employees.

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

- Sign-off on the Code by every new employee upon onboarding.
- Employees at a global director level and above, as well as those in certain higher-risk roles, to acknowledge and sign-off on Core policies annually
- Employee participation in ongoing compliance 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.

To support our compliance program and manage compliance-related risks, our Whistleblower Policy provides employees and non-employees with mechanisms to confidentially report matters of concern. Areas covered under the Policy include unethical and unlawful behaviour, challenges to organizational integrity and 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. Reports can be made by traditional mail, e-mail, or by use of a dedicated 24-hour "Integrity Hotline". To support ethical compliance, we also:

- Provide a supporting policy framework and management systems pertaining to responsible conduct including the Safety and Sustainability Policy, Supply Chain Policy, Government Relations Policy and Donations and Sponsorship Policy. See [Supply Chain](#).
- Conduct anti-corruption and anti-fraud risk assessments periodically at our sites to continuously review the efficacy of Kinross' compliance program at a country-specific level, using a risk-based approach.
- Ensure that compliance-related risks to Kinross' business and our stakeholders are considered as part of Kinross Kinross' Enterprise Risk Management program and aligned with our commitments to the RGMPs and the UN Guiding Principles on Business and Human Rights. See our Management Approach, [Enterprise Risk Management](#) for a detailed overview of our risk strategy, process, accountability and reporting.

Governance and Accountability

Overall management responsibility for ethical conduct and anti-corruption lies with the Chief Executive Officer and accountability sits with functional area leads and site General Managers, clearly defined in company organizational charts. These accountable leaders ensure that all employees are aware of their individual responsibilities under the Code and are supported in these efforts by the Corporate Compliance team, led by the Vice-President, Compliance.

Kinross' Vice-President, Compliance has functional responsibility for ethical compliance and anti-corruption and 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.

Performance pertaining to ethical compliance is reported externally via our annual [Sustainability Report](#).



To learn more about our ethical compliance and anti-corruption, see our most recent [Sustainability Report](#).