

Business Ethics, Corruption and Bribery

Objective, Purpose, and Context

Kinross’ business *purpose* is to deliver value through operational excellence, balance sheet strength, disciplined growth, and responsible mining.

Our business success depends upon a fundamental commitment to ethical conduct. The Kinross Code of Business Conduct and Ethics (Code) is Kinross’ policy for ethical business conduct. The policy *objective* of the Code is to set forth the principles and high standards of ethical behaviour and business conduct expected across our Company and articulate Kinross’ expectations for 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.

We have identified Business ethics, corruption and bribery as a material Sustainability topic for Kinross and a foundational priority for the Company, of critical importance to our stakeholders and the long-term success of our business.

This policy statement relates to the following material impacts, risks and opportunities (IROs).

Impact	Risk	Opportunity
On human rights due to misdirection of funds allocated for public benefits	To reputation and social license to operate due to perception of poor business ethics	
On community cohesion, economic development, and human rights from unethical practices	To legal and financial standing due to allegations of poor business ethics	
<i>On socio-economic and environmental conditions in communities where Kinross operates due to ethical practices</i>		

Note: positive IROs are italicized

This policy statement describes:

- Scope and application: who is affected and where they can find information
- Commitments and approach: how we aim to meet the policy statement objective
- Accountability: who is responsible from site level to Board of Directors

Scope and Application

This policy statement applies to all Kinross geographies and assets, operations and projects, and the global upstream and downstream components of our value chain.

Our stakeholders have been considered in this policy statement as described below:

Stakeholder	Policy statement effect on stakeholder	Consideration of stakeholder in setting this policy statement
Own Workers	Policy statement effect on stakeholder	Company values and culture
Investors/ Financial	To provide clear governance information	Outreach on Sustainability topics
Communities	To provide clarity on company commitments and approach	Relationship, impacts and local benefits
Media	To provide transparency about our commitments and approach	Response to requests and/or proactive outreach
Governments	To provide transparency about our commitments and approach	Relationship, reporting as required and compliance with applicable regulation
Insurers	To provide clear governance information	Outreach on Sustainability topics
Refiners	To provide clear governance information	Through conformance with the Responsible Gold Mining Principles
Suppliers / contractors	To provide clarity on company commitments and approach	Through engagement on Supplier Standards of Conduct and Sustainability topics
Civil Society	To provide transparency about our commitments and approach	Through partnerships and engagement

Continued on next page

Commitments and Approach

As a senior gold company, Kinross is *committed* to the membership requirements of the World Gold Council through its **Responsible Gold Mining Principles**. Principle 1 refers specifically to Ethical conduct (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).

As a supporter of the [UN Global Compact](#), we are also committed to support the [Ten Principles of the UN Global Compact](#), specifically Principles 1 and 2 (human rights) and Principle 10 (anti-corruption). Our commitment supports **Sustainable Development Goals** SDG 16 (Partnership for the Goals), specifically focused on sub-goal 16.5 to substantially reduce corruption and bribery in all their forms.

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](#), a key standard in our framework for ethical 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 [Responsible Procurement](#).

Our approach to ethical conduct is driven by the [Kinross Code of Business Conduct and Ethics](#) (Code). 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
- Create a work environment in which all individuals are treated with respect and dignity
- Avoid conflicts of interest and resolve them transparently when they occur
- Deal ethically with government officials.

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 five principal languages spoken by Kinross’ employees.

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, and promote a company-wide corporate culture of ethical business conduct
- 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, without fear of reprisal. 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”. See Policy Statement, Grievance Mechanisms.

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.
- 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. Awareness and training sessions on anti-corruption and compliance risks are critical to managing these risks.
- Ensure that compliance-related risks to Kinross’ business and our stakeholders are considered as part of 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 Policy Statement, [Enterprise Risk Management](#) for a detailed overview of our risk strategy, process, accountability and reporting.

Continued on next page

Due Diligence

We rely upon a well-established risk -based process focused on mitigating risks in relation to financial crime including bribery and corruption and sanctions-related violations.

Accountability

Functional responsibility for ethical conduct, corruption and bribery, resides with the Vice-President, Deputy General Counsel and Global Compliance. Management responsibility resides with the Chief Executive Officer; and President.

Performance pertaining to ethical compliance is reported quarterly to the Audit and Risk Committee and the Corporate Responsibility Technical Committee of the Kinross Board of Directors.

Kinross reports on our activities and performance pertaining to ethical conduct, corruption and bribery in our annual [Sustainability Report](#).

This policy statement will be reviewed annually in parallel with our Sustainability reporting cycle to ensure it accurately describes what we do in practice to manage our Sustainability impacts, risks and opportunities.

Document control

This policy statement forms an integral part of Kinross' 2024 Sustainability Disclosures, approved by Board resolution on 27-May 2025, and replaces prior documents – Management Approach, Ethical Conduct, Anti-Corruption and Bribery, dated May 2024.



To learn more about our business ethics, corruption and bribery, see our most recent [Sustainability Report](#).

