

# Supplier Code of Business Conduct and Ethics

June 9, 2021

IAMGOLD Corporation is committed to responsible business conduct. The Supplier Code of Business Conduct and Ethics (“Code”) is intended to govern the conduct of vendors and suppliers (“Suppliers”) to IAMGOLD Corporation and its subsidiaries when doing business with or on behalf of IAMGOLD.

## These guiding principles will be applied through a commitment to:

- Adherence to applicable laws and regulations wherever the Company does business
- Respecting the right of all employees to fair treatment, equal opportunity and a working environment free from discrimination or harassment of any sort
- Working in an environmentally responsible manner and working safely, in accordance with regulatory and other industry standards
- Avoid a conflict or the appearance of a conflict of interest
- Being honest and acting with integrity in all business relationships
- Safeguarding IAMGOLD assets, corporate opportunities and confidential information, and protecting them from misuse



Empowering People,  
**Extraordinary Performance**

## Supplier Code of Business Conduct and Ethics Standard

Brief description:	Defines the minimum standards of Supplier business conduct and ethics
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Standard owner:	Benjamin Little, Senior Vice-President, Corporate Affairs, HSS and People
Document owner:	Stephen Crozier, Vice President, Corporate Affairs
Document reviewer:	Benjamin Little, Senior Vice-President, Corporate Affairs, HSS and People
Related documents:	Anti-Bribery/Anti-Corruption Standard Discrimination, Harassment, and Violence in the Workplace Standard. Disclosure Standard Stock Trading Standard Whistleblower Standard Purchase of Goods and Services Standard

## **1.0 Purpose**

The Supplier Code of Business Conduct and Ethics (“Supplier Code”) is intended to govern the conduct of vendors and suppliers (“Suppliers”) to IAMGOLD Corporation and its subsidiaries (“IAMGOLD” or “the Company”) when doing business with or on behalf of IAMGOLD. The Company expects all Suppliers to follow and adhere to all applicable regulations and laws where they operate, as well as the minimum standards provided in the Supplier Code. The purpose of this Standard is to define the minimum requirements IAMGOLD Suppliers are expected to incorporate into the Supplier’s own operation, regardless of the type of contract or the work location, including individuals working for the Supplier through a third-party contract.

The Company expects Suppliers to take appropriate actions to ensure that their own Suppliers also comply with the minimum standards of the Supplier Code. All potential Suppliers will be screened on the basis of their commitment to human rights (including labour rights and health and safety) and environmental performance, as part of IAMGOLD vendor pre-qualification commitments.

Acknowledging, respecting, and adhering to the Supplier Code is a minimum requirement for Suppliers. Each new Supplier is required to certify their awareness and compliance with the Supplier Code. By signing the Supplier Code, the Supplier agrees to meet the expectations and the minimum standards outlined below for governance, human rights, health and safety, community and the environment.

We encourage Suppliers to contact us if they require further guidance, clarification or support to ensure compliance with the Supplier Code. Proactive training and guidance are provided to all Suppliers to ensure that the intent and actions expected as written in the Supplier Code are understood.

To ensure adherence to the Supplier Code, the Company may seek to conduct due diligence on any Supplier. This may take the form of requesting evidence of a recent audit completed or, if insufficient evidence is provided, a direct audit of the primary facility or facilities where the goods or services are manufactured or rendered.

In the case of non-compliance with the Supplier Code’s minimum standards, IAMGOLD will work together with a Supplier to put in place mutually agreed corrective actions within a reasonable timeframe. If the Supplier is unwilling to correct the gaps found or is materially misaligned with IAMGOLD’s values, then it may lead to disciplinary or other action, up to and including termination of the business relationship.

## **2.0 Scope**

The Supplier Code applies to all Suppliers to the Company including but not limited to contractors, consultants, vendors, their subcontractors and any other contracted third party individuals. Suppliers should not subcontract services they perform for the Company or outsource activities that directly impact the delivery of goods and services to the Company without prior written authorization from the Company.

### **3.0 Monitoring and Reporting Code Violations**

IAMGOLD values and encourages its Suppliers to speak up if they have concerns regarding a possible violation of the Supplier Code and other IAMGOLD policies. IAMGOLD maintains an “open door” regarding questions of business conduct as they relate to the Supplier Code and its applicability. Suppliers are encouraged to ask such questions in respect of any particular situation no matter how small or insignificant it may seem to be.

Each Supplier is encouraged to be alert to any work related activities which could be construed as a violation of the Supplier Code. If a Supplier becomes aware of such a potential violation, they must bring the matter to the attention of the person in the Company they are doing business with or through the confidential reporting service. For further information about such confidential reporting service, please refer to the Company’s Whistleblower Policy, which is incorporated by reference herein.

Retaliation against any Supplier who in good faith reports a concern about any illegal or unethical conduct will not be tolerated. Reporting a Code violation knowing it to be false may also result in disciplinary or other action up to and including termination of the business relationship.

Other than as may be reported through the confidential reporting service available on IAMGOLD’s website, if any member of management receives a report of any alleged violation of the Supplier Code, he or she must promptly inform the Senior Vice-President, General Counsel and Corporate Secretary and the Vice-President, Internal Audit and Risk Management at IAMGOLD of such report. Contact details can be found in Appendix A. An investigation will be conducted to determine whether a violation has in fact occurred. Appropriate corrective action, including disciplinary or other action up to and including termination of the business relationship will result from the investigation.

Any Supplier or representative who withholds information during the course of an investigation regarding a possible violation of the Supplier Code is subject to disciplinary or other action, up to and including termination of the business relationship.

### **4.0 Legal Compliance**

#### 4.1 Compliance with Laws and Regulations

The Company expects Suppliers to make ethical decisions, which requires a commitment to do the right thing regardless of the cost, and to act consistently with and apply the Supplier Code and the Company’s values each day. Suppliers who act illegally or unethically can affect the Company’s financial performance and profitability, significantly impact the Company’s reputation and potentially expose IAMGOLD and its employees to criminal or civil penalties. To avoid this, the Company strives to work with Suppliers who operate with commensurate Codes of Conduct.

The Company’s operations are subject to a significant number of complex and changing laws and regulations, and all Suppliers are expected to abide by the laws of the countries in which they operate and conduct business according to the Supplier Code, even if local customs or practices differ from standards as set out in the Supplier Code. The law takes precedence in cases where there may be a conflict between

the law and traditional or industry practices. The Supplier Code is in addition to, and does not reduce or supersede, any contractual obligations between IAMGOLD and its Suppliers.

#### 4.2 Taxation

Suppliers must comply fully with all obligations in relation to all taxes due within the jurisdictions in which they operate. Suppliers must not participate in tax evasion or facilitate tax evasion by others. Specifically, the Company expects its Suppliers to have contracts, policies, systems, and/or procedures in place to ensure that all who act for them or on their behalf, also comply with such obligations.

#### 4.3 Insider Trading

Securities and stock exchange laws and regulations are extremely strict regarding the use and selective disclosure of information that, if publicly disclosed, could have a significant impact on the market price or value of the Company's securities or affect any reasonable investor's investment decision.

Suppliers are prohibited from purchasing and selling Company shares and derivatives based on Company shares, such as securities convertible into Company shares, when they are in possession of material non-public information concerning the business and affairs of the Company. They are similarly prohibited from informing others about such information, except in the necessary course of business and where the other party is under an obligation of confidentiality. Suppliers and representatives with access to financial and other material information may only trade in accordance with the Company's Stock Trading Policy and Standard. For more information, please refer to the Company's Stock Trading Policy and Standard, which is incorporated by reference herein.

#### 4.4 Anti-Corruption

Suppliers must generally support open, fair and competitive business environments. The Company expects that Suppliers do not engage in price fixing, business espionage, or other unfair, anti-competitive trade practices.

Under no circumstances is it acceptable to offer, give, solicit or receive any form of bribe, kickback, or inducement. In the same manner, the Supplier must avoid either the fact or the appearance of improperly influencing relationships with organizations or individuals with whom the Company deals in the course of its business. For more information, please refer to the Company's Anti-Bribery and Anti-Corruption Policy and Standard, which is incorporated by reference herein.

All Suppliers shall conduct their dealings with government officials and employees in compliance with the Corruption of Foreign Public Officials Act (Canada) (the "CFPOA"), the Foreign Corrupt Practices Act (United States) (the "FCPA") and local laws and in such a way that the integrity and reputation of the Company, the government and the government officials or employees will not be brought into question or not be a source of embarrassment should the details of such relationship become public knowledge. For more information, please refer to the Company's Anti-Bribery/Anti-Corruption Policy and Standard, which is incorporated by reference herein.

#### 4.5 Anti-money Laundering

Suppliers shall support and contribute to the effective elimination of money laundering where there is an identifiable and reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of gold. Suppliers must not conduct business with parties who may

be involved in or who support terrorist activities. Moreover, Suppliers must not knowingly accept funds that are derived from unlawful sources or activities. Suppliers shall be committed to complying fully with all applicable anti-money laundering laws throughout the world

#### 4.6 Conflicts of Interest

In discharging their duties, Suppliers must act honestly and in good faith with a view to the best interests of the Company. Suppliers must avoid situations involving a conflict of interest between their personal interests and the interests of the Company. Actions taken and decisions made by the Supplier should be documented and based on impartial and objective assessment of the facts in each situation, free from influence from gifts and favours and the like, which may adversely affect the Supplier's judgment.

If the Supplier perceives there to be a potential conflict of interest, the Supplier must immediately disclose this to the Company so that appropriate action can be taken to mitigate risks. Suppliers should be aware of the association with "politically exposed persons" and declare these in all dealings with the Company.

### **5.0 Respecting Human Rights and Dignity**

#### 5.1 Respect and Integrity of the Person

The Company is committed to respecting human rights globally. IAMGOLD values and supports the dignity and human rights of all people and expect the same commitment from Suppliers. Suppliers should have a whistleblower channel in place with clear communication with their employees that there is no retribution for speaking up.

The Company is committed to promoting a workplace that is respectful of individuals, their integrity and their dignity and expects Suppliers to provide for policies within their workplaces that prohibit violence, discrimination and harassment, including sexual harassment.

All Suppliers must conduct their operations in a manner consistent with the United Nations Universal Declaration of Human Rights and the International Labour Organization's core labour rights.

#### 5.2 Fitness for Work

The Company is committed to maintaining a safe and healthy work environment. To ensure that everyone is fit to perform their work, Suppliers must not: (i) consume alcoholic beverages or other intoxicating substances (e.g. cannabis) in quantities that affect work performance or impair their judgment during work hours, (ii) consume, provide or serve alcoholic beverages or other intoxicating substances on the Company's premises, except when approved by the President and Chief Executive Officer, Senior Vice President General Counsel & Corporate Secretary or the Senior Vice-President, Corporate Affairs, HSS & People, or (iii) consume, possess, sell or distribute illegal substances on Company premises, at any Company function or at any other time when you could be identified as a Company representative.

#### 5.3 Labour and Human Rights

Suppliers shall ensure that all employees, including contract workers, should work at their own will. Suppliers will not be involved in human trafficking or use any form of slave, forced, bonded, indentured, or prison labour.

Suppliers shall ensure that none of their employees, including contract workers, should be required to pay any fees to obtain or retain their employment. Fees and costs associated with recruitment and employment should be paid by the Supplier. Suppliers should not withhold employees' original government-issued identification and travel documents. Suppliers will ensure that their employees' contracts are clear, in a language understood by them and that they are aware of the terms and conditions of their work. Suppliers will not impose unreasonable restrictions on movement within the workplace.

IAMGOLD expects Suppliers to treat people equally and fairly, based on the principles of non-discrimination. The Supplier should foster a culture of inclusivity by respecting cultural and individual diversity. The Company expects that the Supplier employs, rewards and promotes based on the principle of equal opportunity, without distinction, according to race, ethnicity, caste, gender, sexual orientation, religion, nationality, social origin, age, political affiliation, disability, or any other characteristics or status protected by applicable law. This means that the Supplier makes employment decisions including hiring, placement, promotion, development, training, and compensation based on the person's qualifications, experience, performance, skills and potential.

#### 5.4 Prevention of Underage Labour

Suppliers must respect the rights of the child as stated in the Convention on the Rights of Child, and will not engage in, or allow, child labour, within their facilities or in those of their suppliers. Suppliers should follow the International Labour Organization (ILO) definition of the minimum age for admission to employment or work. This age will not be lower than the age of completion of compulsory schooling, in any case, should not be under 15 years of age, except in some countries where it may vary based on local legislation. The Supplier should comply with local law if that sets an older age to define child labour.

#### 5.5 Working Hours

The Supplier should always comply with the local laws and regulations with respect to working hours, overtime and days of rest. Suppliers should provide enough rest and leisure and take measures to prevent employees from working excessive hours.

In the absence of local laws or collective agreements, a workweek should be restricted to 60 hours, including overtime, and at least one day off every seven days except in emergencies or unusual situations. Working hours, inclusive of overtime, shall not exceed 12 hours in any 24 hour period.

#### 5.7 Wages and Benefits

The Supplier will pay its employees at least the minimum wage for work performed, respecting the statutory minimum wage set in the country in which it operates. Where the statutory minimum wage is non-existent or not sufficient to meet basic living needs, the supplier must pay employees enough to ensure a decent living standard. This wage should satisfy basic food, shelter and medical needs for employees and their families.

Suppliers will provide any benefits required by law and/or contract with employees. Suppliers must meet all legal requirements relating to wage and benefits, paying accurately and in a timely manner. All use of temporary and outsourced labour will be within the limits of the local law.

### 5.8 Freedom of Association and Collective Bargaining

Suppliers shall commit to and respect employees' right to participate in freedom of association and collective bargaining, without interference, discrimination, retaliation, or harassment. Suppliers should ensure that there is zero retribution against any employee who exercises these rights.

### 5.9 Privacy and Personal Information

IAMGOLD believes in taking steps to protect the privacy with whom the Company has a business relationship. IAMGOLD will not interfere in the personal lives of such individuals unless their conduct impairs their work performance or adversely affects the work environment or reputation of the Company.

Personal information is information about or that is related to an identifiable individual. The Company limits the collection of personal information to that which is necessary for business, legal, safety, security or contractual purposes and collection of such personal information is to be conducted by fair and lawful means and, except where otherwise permitted or required by law, with the explicit knowledge and consent of the individual from whom the information is being collected. Access to personal information is limited to those with a need to know such information for a legitimate business purpose and whose duties reasonably require access to such information.

IAMGOLD expects all Suppliers are committed to the accuracy of the information they provide, safeguard confidential information of the Company, and keep records in compliance with local legislation. Suppliers shall adhere to the Company's policies, standards and procedures regarding the collection, use, and disclosure of personal information and those in place to protect personal information against loss or theft as well as unauthorized access, disclosure, copying, use or modification. Suppliers shall comply with all applicable laws regulating the disclosure of personal information, including the Personal Information Protection and Electronics Documents Act of Canada.

## **6.0 Environment, Community, & Health and Safety**

### 6.1 Protection of the Environment

The Company is committed to conducting its business in a manner that protects the environment, preserves resources and ensures sustainable development. As IAMGOLD's commitment to Zero Harm, the Company tries to mitigate any negative impacts and seek to compensate or enhance positive impacts. Suppliers shall monitor their environmental impacts and assess and manage environmental risks. Suppliers must be aware of the environmental impacts caused by their services or products and implement measures to minimize the impact and keep the accepted levels under control.

IAMGOLD expects Suppliers to adhere to applicable local laws concerning their products and services and in their management of energy, water, waste and hazardous materials. Suppliers must demonstrate compliance with all local legislation, regulations, by-laws and any applicable environmental related guidelines. Suppliers must also maintain all required permits and documentation and keep these available for inspection. Suppliers are strongly encouraged to improve disclosure and embed management systems for:

- Reduced energy consumption
- Responsible use of water



- Safe handling and disposal chemicals
- Improved management of waste, reduced air emissions and waste-water discharges
- Containment of spillages and other potential accidental discharges

Where goods are provided, Suppliers should strive to eliminate unnecessary packaging and have processes in place to safely recycle or re-use waste by-products. IAMGOLD encourages Suppliers who harm biodiversity to offset their impact.

## 6.2 Communities and Indigenous People

IAMGOLD respects, values, and cares about the communities that the Company operates in. IAMGOLD believes in developing lasting mutual benefits and are guided the by the principle of self-determination. The Company respects Indigenous people’s rights and aim to achieve Free, Prior, and Informed Consent.

Suppliers should be good corporate citizens within the communities they operate by respecting human dignity and the rights of individuals and the communities associated with their operations. IAMGOLD expects Suppliers to recognize cultural heritage and traditions of local and indigenous communities and handle any matters in a spirit of respect, trust and dialogue. Grievance and complaints mechanisms for external parties must be made available by Suppliers to the communities they interact with.

Where possible, Suppliers should seek to enrich local communities and teach skills that enable people to prosper beyond the life of mine or contract. To foster economic inclusion, IAMGOLD encourages Suppliers to have a policy of building skills, employing local community members, and increasing their participation in the supply chain, including and especially those who are under-represented.

Suppliers operating near or in the community must notify the Company of any commitments made regarding employment, procurement or skills building. Suppliers should be aware of how their service, product, or activities may impact, positively or negatively, communities. IAMGOLD expects Suppliers to respect and comply with the terms of any agreement between the Company and Indigenous Peoples relevant to the scope of the work performed by the Supplier.

## 6.3 Health and Safety

The Company is committed to ensuring a healthy working environment and safe working conditions. Suppliers are expected to protect the health and safety of their workforce. Suppliers should measure and report incident or illness rates with their organization and use these and a risk management system as a basis for improving their health and safety performance. Suppliers must:

- Strive to eliminate fatalities, work-related injuries and health impairment of the workforce
- Assign management responsibility for and have appropriate policies and preventative maintenance programs in place aimed at protecting the safety and health of their workforce. Suppliers are expected to maintain a zero tolerance approach to unsafe behaviour.
- Assess and manage risks associated with health and safety hazards, including occupational exposure, with written procedures, work instructions and appropriate personal protective equipment for addressing these. Personal protective equipment must be available for the type of operation performed and available at no cost to the employee.
- Comply with all legislation, regulations, by-laws and any guidelines as applicable to ensure a safe, productive, and hygienic working environment.

- Ensure that workers receive regular health and safety training and are able to operate tools, equipment, and vehicles safely.
- Maintain a high level of emergency preparedness and response to manage any potential safety, health or environmental emergency including fire safety.

Suppliers must ensure that employees have the right to refuse unsafe work and to report unhealthy working conditions, without fear of reprisal. Health and safety-related information must be easily accessible in the Supplier's workplace. Suppliers are expected to maintain all health and safety related documentation, including permits, license and other records as required by law. Site-based contractors shall ensure that all materials and chemicals brought onto site will have up to date Material Safety Data Sheets and be in original labelled containers, or clearly marked with handling, use and disposal instructions.

#### 6.4 Emergency Preparedness

Suppliers are critical in ensuring operational stability of the Company. In order to ensure security of employees, operations, and security of IAMGOLD's supply in times of natural events, major catastrophes such as pandemics, and other unforeseen events, it is essential that IAMGOLD has an understanding of the Supplier's emergency preparedness and business continuity plans. To the extent it is available, Suppliers must provide the Company with documents related to their organization's emergency preparedness and business recovery plans to ensure IAMGOLD has a strong understanding of plans in place in case of an emergency.

## **7.0 Company Assets**

### 7.1 Use of Company Assets

Suppliers are entrusted with the care and use of Company assets with the expectation that they will be used for the benefit of, and as directed by, the Company. Using Company assets for Supplier's gain is a violation of this trust. Suppliers may not obtain, use, or divert Company assets for their gain or benefit, or for the gain or benefit of anyone else. The Company will not tolerate theft under any circumstances and will seek to enforce all available remedies in the event of such theft, including both civil and criminal remedies, where available.



# IAMGOLD

C O R P O R A T I O N

## AGREEMENT TO COMPLY WITH IAMGOLD'S SUPPLIER CODE OF BUSINESS CONDUCT & ETHICS

Supplier: \_\_\_\_\_

Name of Authorized  
Signatory: \_\_\_\_\_

The Supplier hereby acknowledges having received, read and understood a copy of *IAMGOLD'S Supplier Code of Business Conduct and Ethics* for Suppliers of IAMGOLD Corporation and its subsidiaries and hereby undertakes to comply with its provisions, promote the goals, measures, objectives and principles set forth therein and take all the necessary steps to ensure its application in our work environment.

Finally, the Supplier agrees that we have the responsibility to speak to the person that we are doing business with at the Company or IAMGOLD Supply Chain, should we have any concerns about a possible violation of *the IAMGOLD Supplier Code of Business Conduct and Ethics*.

Signature

Date

\_\_\_\_\_

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## 8.0 Conflict of Interest Disclosure

IAMGOLD Corporation (“the Company”) directors, employees, contractors, suppliers and representatives are required to avoid Conflict of Interest in adhering to the Supplier Code of Business Conduct and Ethics (“Code”). This Disclosure Statement has been prepared to facilitate compliance with the “Code”:

“In discharging their duties, Suppliers and Representatives must act honestly and in good faith with a view to the best interests of the Company. Suppliers must avoid situations involving a conflict between their personal interests and the interests of the Company. ”

Note: “Conflicted Person” includes (but not limited to) spouse, children, parents, siblings, in-laws, uncles, aunts, nephews and nieces.

Signing this form signifies that you have read IAMGOLD’s Supplier Code of Business Conduct and Ethics, and have disclosed all instances where a conflict of interest exists.

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Supplier Signature

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Date

## Appendix A: Contact Information

Name	Title	Contact Information
Tim Bradburn	SVP, General Counsel & Corporate Secretary	<a href="mailto:Tim_Bradburn@iamgold.com">Tim_Bradburn@iamgold.com</a>
Aun Ali Khokhawala	Vice-President, Internal Audit and Risk Management	<a href="mailto:AunAli_Khokhawala@iamgold.com">AunAli_Khokhawala@iamgold.com</a>