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Supplier Code of Conduct

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OCEANA GOLD

INTRODUCTION

We choose to work with suppliers who share and respect our Values and work with us to do business responsibly and ethically.

OceanaGold Corporation is a member of the World Gold Council and as such OceanaGold (Philippines), Inc. (the “**Company**”) is committed to conforming with the Responsible Gold Mining Principles framework.

This Supplier Code of Conduct (“**Supplier Code**”) sets out how we expect our suppliers to work with us. It applies to all suppliers, and their employees, contractors, sub-contractors, vendors, suppliers and advisors (‘**You**’). It does not cover every issue that may arise, but sets out basic principles.

As a supplier of goods and/or services to OceanaGold, we expect You will:

- Work ethically, safely and responsibly.
- Understand our Supplier Code and put it into daily practice when You work with us.
- Ask OceanaGold for clarity if our Supplier Code does not provide sufficient guidance.
- Follow all applicable OceanaGold policies, standards, site procedures, contractual agreements and conditions when You’re working at an OceanaGold site.
- Comply with all laws, regulations, standards and sanctions that apply to your work.
- If there are differences between the expectations in our Supplier Code and your local laws, regulations and cultural norms, follow the higher standard of conduct.
- Report breaches of our Supplier Code to OceanaGold.
- Cooperate with any investigation, assurance activity, audit or inquiry related to our Supplier Code or your contract as directed by OceanaGold.

WHAT WE VALUE

When You are working with us, we expect that your actions will align with the following Values :



CARE

We care for the safety, health and well-being of our people, the environment and local communities.



RESPECT

We respect and listen to each other, embracing different views and diversity in all its forms.



INTEGRITY

We do the right thing and take accountability to deliver on our commitments.



PERFORMANCE

We strive for excellence through learning, continuous improvement and innovating.



TEAMWORK

We achieve great outcomes by everyone contributing and working together.

FAIRNESS AND RESPECT



At OceanaGold we care for and respect each other. Everyone should be treated fairly and feel safe and respected at work.

We expect You to:

- Treat all people (including your employees, our employees, agents and other suppliers) with respect.
- Treat all people (including your employees, our employees, agents and other suppliers) fairly and respect diversity in all its forms.
- Not engage in any form of discrimination (including based on sex, age, religion, race, national origin, sexual orientation or disability) or vilification, harassment or sexual harassment, bullying, victimisation or violence.
- Comply with all applicable workplace and employment laws and regulations.
- Not use forced, compulsory or child labour.

HEALTH AND SAFETY



Safety is everyone's responsibility. We want everyone to go home safe and well each day.

We expect You to:

- Provide safe and secure working conditions.
- Review, understand and comply with OceanaGold health and safety policies and procedures, and applicable local laws and regulations.
- Speak up if You see any potential hazards, unsafe work conditions or practices, or if You are unsure about the safety of something or someone.
- Be fit for work and not influenced by drugs or alcohol.
- Follow all required procedures and risk management plans while at an OceanaGold site.



ENVIRONMENT



We commit to responsible environmental management and strive to protect the environment.

We expect You to:

- Work in an environmentally responsible manner to carefully manage environmental risks and minimise impacts.
- Review, understand, and comply with OceanaGold's environment policies and procedures and all relevant permits, relevant industry standards, and applicable laws and regulations.
- Speak up if You observe any environment impacts, hazards or incidents or if You are unsure about any potential environmental impacts.

HUMAN RIGHTS



We commit to respect the human rights of all people impacted by our operations, including workers in our supply chain.

We expect You to:

- Respect the human rights of all your stakeholders, including communities, your employees and those in your supply chain.
- Check that workers are of local legal age to work and not use child labour.
- Not engage in deceptive recruitment practices, or use any forced, bonded or involuntary labour.
- Take steps to understand and address the modern slavery risks in your operations and supply chain.
- Not do anything that directly or indirectly contributes to human rights violations, including modern slavery.
- Recognise the fundamental right of workforce to form and/or join lawful trade unions or employee groups of their choosing.
- Follow our policies, procedures and processes to respect human rights in our joint activities and notify us quickly if You suspect a breach.
- Work with us to address any human rights issues that arise.



COMMUNITIES & INDIGENOUS PEOPLES



We are committed to working with local communities and Indigenous Peoples where we operate to create positive relationships and outcomes.

We expect You to:

- Treat all members of the communities where we operate with dignity and respect.
- When engaging with the communities where we operate, listen and respond openly, respectfully and collaboratively.
- Obtain all necessary compliance approvals to conduct your work.
- Avoid causing harm to the communities You work with and/or those communities where we operate.
- Respond to community concerns, complaints and grievances through a fair, timely and transparent process.
- Respect the rights and interests, including cultural heritage, of Indigenous Peoples and their communities.
- Consider opportunities to provide employment to members of the local community, including using local subcontractors.



BRIBERY, CORRUPTION, FRAUD & MONEY LAUNDERING

We want to contribute and succeed fairly and honestly. We do not tolerate or engage in bribery, corruption, fraud or money laundering in any form.

We expect You to:

- Comply with all applicable anti-bribery, anti-corruption, fraud and money laundering laws and regulations.
- Not to give, accept, ask for, offer or authorise anything that might improperly influence a decision. This includes:
 - bribery of public officials, kickbacks, secret commissions, facilitation payments or improper payments regardless of whether any of these are perceived to be acceptable under local custom.
- Not to do anything that could, or could appear to, compromise your ability or our ability to make objective and fair business decisions.
- Only offer or accept gifts, hospitality which is of low value and generally acceptable as per local custom and not intended to gain an improper advantage or obtain or retain business.
- Take extra care when engaging with government officials.
- Not make payments to a political party, politician or candidate for office for or on behalf of us.
- Keep accurate books and records.
- Promptly Speak Up to OceanaGold about anything which appears to breach these principles. For example, if you are asked to pay a kickback.



CONFLICTS OF INTEREST



Every day we work to build and sustain trust with our workforce, suppliers, communities and investors. We take care that our decisions in our work are not influenced by interests which could conflict with OceanaGold's interests.

We expect You to:

- Consider if Your interests conflict (or appear to conflict) with OceanaGold's interests or your responsibilities to OceanaGold. Where possible, avoid such situations.
- Where a conflict cannot be avoided, disclose to OceanaGold any potential, perceived or actual conflict as soon as You become aware of it and provide complete and accurate details to allow us to assess it.
- Manage any conflicts of interest transparently and fairly and in the best interests of OceanaGold.
- Not use your position or relationship with OceanaGold to unfairly benefit yourself or those close to You.

FAIR COMPETITION



We compete fairly and succeed on merit.

We expect You to:

- Behave fairly, and not misuse information, power, or influence.
- Not manipulate, collude, conceal or misrepresent.
- Respect OceanaGold's confidential information and not share it with others, including your or our competitors.
- Check if the information is available publicly before sharing it outside OceanaGold.

PRIVACY AND INFORMATION

Disclosing or using any personal information inappropriately can compromise the privacy and security of individuals and entities. We collect, use, store and dispose of personal information responsibly and legally.

We expect You to:

- Keep OceanaGold's business information confidential and secure and only use it for its intended purpose.
- Comply with OceanaGold's applicable IT and Privacy procedures and local privacy and data protection laws and regulations.
- Respect the privacy of your employees and customers.
- Immediately report potential and actual data breaches that impact OceanaGold to the OceanaGold Privacy Officer at privacy@oceanagold.com
- If You are unsure whether you are allowed to share particular information, seek advice from OceanaGold.
- Retain OceanaGold data on your systems only for as long as required.

INSIDER

INFORMATION

We do not use confidential or insider information for personal gain for ourselves or others.

We expect You to:

- Keep insider information strictly confidential.
- Never use or disclose insider information about OceanaGold for personal gain or the benefit of others.
- Not use, or encourage anyone else to use, inside information to deal in securities (including buying or selling shares).



SPEAK UP



If You see something that is not right, or you think may not be right, we ask that You speak up – this can help us to prevent something from going wrong or respond if something wrong has happened.

You can report a concern about potential and actual misconduct at speakup.oceanagold.com – our confidential and independently run Hotline. If you are on an OceanaGold site, you can also locate posters for the Hotline with local phone numbers.

Potential misconduct includes fraud, theft, bribery, corruption, kickbacks, misconduct endangering health and safety or the environment, serious breaches of OceanaGold’s policies and procedures (including our Code of Conduct and Supplier Code), conflicts of interest, harassment, discrimination, victimisation or bullying, human rights abuses, insider trading, and other unlawful or criminal activities.

HOW WE WORK WITH OUR SUPPLIERS

We want to work collaboratively with You in complying with our Supplier Code.

We will treat You with respect and never ask You to act in a way that breaches the law, our Values or our Supplier Code.

Breaching our Supplier Code can have serious consequences and we will take action that is proportionate to the breach.

This could include working with You to develop remediation or corrective action plans. In more serious or severe cases, our actions could also include suspension or termination of our business relationship.

GET IN TOUCH

If you have a question or other feedback about this Supplier Code, you can contact us at suppliercode@oceanagold.com

If you are concerned about a breach of our Supplier Code you can contact your OceanaGold contract owner, Principal Representative or speakup.oceanagold.com.

