

SUPPLY CHAIN MANAGEMENT

OUR MANAGEMENT APPROACH

Our Global Code of Ethical Conduct, Global Anti-Corruption Policy,⁽¹⁾ and Supplier Code of Conduct establish the ethical foundation for our supply chain practices. These policies define corporate expectations for both our organization and business partners, ensuring responsible sourcing, transparency, and compliance with applicable laws, regulations, and standards. Our policies promote integrity, fairness, and sustainability across our supplier network. Additionally, our policies reflect the legal and regulatory requirements of the countries where we operate.

Strong governance enables us to mitigate supply chain risks, uphold stakeholder expectations, and continuously enhance accountability and sustainability performance. By fostering ethical partnerships and prioritizing responsible procurement, we strengthen the resilience and integrity of our global supply chain.

Policies

- [Global Code of Ethical Conduct \(Code of Conduct\)](#)
- [Supplier Code of Conduct \(Supplier Code\)](#)
- [Global Anti-Corruption Policy \(Anti-Corruption Policy\)](#)

- [Global Human Rights Policy](#)
- [Environmental Policy](#)
- [Health and Safety Policy](#)

Standards and Guidelines

- Gifts and Hospitality Guidelines provide employees clear guidance when interacting with government officials, business partners, and commercial clients to prevent conflicts of interest and improper influence.

Programs, Plans, and Initiatives

- The GAN Integrity platform is implemented across all sites to strengthen supplier due diligence and risk assessments. Suppliers are evaluated based on three key criteria:
 - Compliance with business ethics principles.
 - Human rights management, including risks related to modern slavery/forced labour.
 - Environmental performance and practice.
- Procurement protocols, customized by jurisdiction, include guidelines and controls for contract bidding and vendor selection processes, promoting fairness and transparency.

Monitoring and Evaluating

- We continuously assess the implementation and effectiveness of our supplier screening and due diligence system to ensure robust risk management.
- Suppliers undergo ongoing monitoring and evaluation based on the risk assessment category assigned during their initial screening.
- Findings from these evaluations inform enhancements to our programs, ensuring alignment with evolving regulatory requirements and industry best practices.
- Our Supply Chain Due Diligence System evaluates and continuously monitors new and existing suppliers for compliance with our key policies, covering ethical business conduct, anti-corruption, human rights management, and environmental performance. Through this process, we ensure that our supply chain partners align with our corporate values and contribute to responsible and sustainable operations.

Accountability

- The Contracts and Supply Chain teams review supplier documentation and compliance with supply chain requirements at each mine unit, supported by the local Legal and Compliance teams. They report locally to the Finance Director, with escalation to the Corporate Vice President of Finance.
- The Vice President of Legal Operations and Compliance manages the anti-corruption programs and practices, and provides annual compliance reports to the Board's Audit Committee.
- The Chief Legal and Human Resources Officer, General Counsel oversees legal compliance and anti-corruption efforts, and reports regularly on these matters to the Board's Audit Committee.
- The Nominating and Governance Committee of the Board oversees compliance with the Code of Conduct.
- The Audit Committee of the Board oversees matters related to anti-corruption and the Whistleblower Program.

(1) The scope of our Global Anti-Corruption Policy seeks to prevent, control, and manage corruption or fraud cases in the interaction of Pan American Silver and its employees with governmental officers and with all third parties with whom any business is conducted.