



## **DYNACOR GROUP INC.**

### **CODE OF CONDUCT**

(UPDATED AUGUST 2023)

#### **A MESSAGE FROM THE PRESIDENT AND CEO**

Dynacor Group Inc. (the “**Corporation**” or “**Dynacor**”) aims to be the world leader in environmentally and socially responsible artisanal gold ore processing, based on excellence in behaviour and conduct of its directors, officers and employees, to create a values-based culture that will be consolidated with this Code of Conduct (the “Code”).

Respecting and complying with the contents of this Code of Conduct in order to maintain our solid reputation is a core duty for us all, who form part of the Corporation.

I invite you to read, apply and disseminate this Code of Conduct with responsibility and involvement.

#### **PURPOSE OF THE CODE OF CONDUCT**

The purpose of the Code of Conduct is to establish values that are to guide the behaviour of the Corporation and that of the third parties with whom it maintains relationships, and to contribute to consolidating a business conduct that is accepted and complied with by all employees and officers. The Code of Conduct aims at guiding the establishment of a culture based on respect, honesty, leadership, excellence, environmental protection, social responsibility and the preservation of the health and safety of individuals.

#### **SCOPE OF THE CODE OF CONDUCT**

The Code of Conduct applies to all employees, members of the Board of Directors and strategic partners. Directors, officers and employees of the Corporation are required to comply with the duties and obligations established under legislation and internal policies. Compliance with the Code of Conduct is mandatory inside and outside the operations and offices, and behaviour that may be contrary to this Code of Conduct and the law is to be avoided.

##### **1. Compliance with Legislation**

Dynacor identifies and avoids any action that could be interpreted as contrary to the law.

All employees are required to comply with legal regulations applicable in their procedures and in case of doubt, they must consult with their first-line supervisors or the legal department.

##### **2. Health and Safety**

Dynacor is committed to providing a safe and healthy working environment to prevent injury and illness to its employees and visitors.

Employees must be conscious of their occupational health and safety and are required to comply with their duties and responsibilities described in the Internal Regulation for Occupational Health and Safety.

### **3. Environmental Protection**

Dynacor is committed to conducting its activities while protecting the environment, preserving natural resources and ensuring sustainable development.

Employees undertake to preserve their environment and contribute to improving the performance of the Corporation.

### **4. Human Rights**

Dynacor subscribes to the United Nations' Universal Declaration of Human Rights; it complies with these rights in all its facilities.

The Corporation prevents all forms of child labour, prostitution, forced labour, degrading treatment of women, human trafficking and enforced disappearances.

Dynacor and its employees have the duty and responsibility to respect and protect human rights as well as make such rights a reality.

### **5. Labour Relations**

Dynacor complies with all its labour and social security obligations to its employees, creating a climate of respect and trust with employees and promoting them based on their performance.

The Corporation provides for an adequate working environment for employees to discharge their duties in the best possible way, while respecting their functions.

Dynacor and its strategic partners acknowledge and respect the rights of employees to freedom of association and collective bargaining.

For their part, employees are required to comply with their duties as set out in the internal regulation.

## **6. Diversity, Inclusion and Non-discrimination**

Dynacor does not engage in discriminatory, harassing or abusive practices in the course of the employment relationship with any employee. Employees are treated equally and differences in age, race, origin, sex, sexual orientation, culture, religion and physical capacities are respected.

Employees who consider that these rights are violated may make a report in accordance with internal regulations and applicable law.

## **7. Anti-Corruption and Anti-Bribery Measures**

Bribery and corruption in any form are not tolerated at Dynacor. We do not offer or give to any public servant or other individual or to members of their families any reward, advantage or benefit in exchange for an act or omission, aimed at convincing such individual to use his or her position to influence an action or decision of a government to the benefit of the Corporation.

## **8. Conflicts of Interests**

Dynacor seeks to place the Corporation's interests ahead of personal interests. For this purpose, it takes decisions which are generally known.

Employees are required not to place their personal interests over their working duties. For this purpose, they are required to avoid any conflict of interest arising from internal or external influence.

In the case of a conflict of interest, they are required to inform their first-line supervisors thereof.

## **9. Preventing Money Laundering and the Financing of Terrorism**

Dynacor prevents the risks of money laundering and the financing of terrorism as well as operational and legal risks that such activities could cause for the Corporation.

Directors and employees are required to maintain a vigilant attitude when faced with any unusual operation and to report it to the Corporation's internal body so that it can report it in turn to the competent authorities.

## **10. Relationships with Suppliers and Customers**

Dynacor is committed to meeting the needs and expectation of its customers by supplying quality products meeting international standards. Furthermore, Dynacor receives ongoing information on new market demands which are met in the context of our ongoing improvement procedures.

Suppliers of raw materials, supplies and services are our strategic partners and are selected on the basis of their formal status, transparently and for the quality of their products and services.

## **11. Relationships with the Community**

Dynacor favours harmonious relationships with communities that it directly influences and those of other regions. In connection with our corporate social responsibility, we seek to improve living conditions in the locations where we invest.

Dynacor respects the culture, customs and diversity of communities and favours local hiring.

## **12. Protection of Personal Information**

Dynacor is responsible for protecting the personal information it holds; it applies very strict security measures to protect personal information against unauthorized access, use, communication, unauthorized modification, loss, theft, or any other breach of the security of the information. The information collected is protected by reasonable computer security measures given its sensitivity.

## **13. Communication and Implementation**

Dynacor's directors promote adequate channels allowing employees to communicate with them or their immediate hierarchy respecting any concern. As well, the internal standards, codes and policies are communicated in the employees' language at all levels of the Corporation. Dynacor maintains an open and honest dialogue with all its employees and stakeholders.

Dynacor and its strategic partners are required to implement this Code of Conduct and all applicable laws.