# **Hecla Mining Company Supplier Code of Conduct**

### Overview

This Supplier Code of Conduct (Supplier Code) or terms specified in a contract, sets out the minimum standards of conduct expected from all Suppliers wishing to do business with, or on behalf of, Hecla and its subsidiaries (collectively, "Hecla"). "Suppliers" refer to any business, individual, or other legal entity that provides goods and/or services to Hecla, engages in any other commercial relationship with Hecla, and includes employees, subcontractors, directors, officers or agents of Supplier or other legal entity.

We value our relationships with our Suppliers, as these partners are an essential part of our supply chain that provides the critical minerals and metals necessary for our modern world. We believe this joint commitment to ethical conduct and integrity is a strong foundation for trusted business relationships that create shared value.

A copy of this Supplier Code will be made available on Hecla's website <a href="www.hecla-mining.com">www.hecla-mining.com</a>. Suppliers will be directed to access this link by incorporating language regarding the Supplier Code into our standard agreements. Suppliers, and all their subcontractors, are expected to review, fully understand and comply with this Supplier Code.

### **Hecla's Core Values**

Hecla's core values are embedded in all aspects of our daily operations. We expect our Suppliers to be committed to these same values that are included in our Hecla Code of Conduct.

- Providing a safe workplace
- Being a responsible environment steward
- Performing duties and responsibilities with integrity, honesty and professionalism
- Conducting themselves in a manner that reflects well on Hecla
- Respecting local and national cultures

### Compliance with Laws, Rules, & Regulations

Suppliers must operate their businesses in compliance with all applicable laws, codes, rules, and regulations of the jurisdictions in which they operate as well as those specified in this Supplier Code.

### **Health & Safety**

We expect our Suppliers to comply with all health and safety laws, and to provide a safe and healthy environment for their own employees, suppliers, customers, and others.

Depending on the nature of the work to be undertaken by Vendors or Suppliers, prior to working on any one of our properties or on our behalf, Suppliers must:

- Complete all health and safety training required by Hecla and by law (including the Mine Safety and Health Act for our US sites) prior to any visit or to conducting work or business on any of Hecla's sites
- Immediately report unsafe working conditions that they are unable to control and mitigate
- Immediately report any health or safety incidents

### **Prohibited Substances**

Hecla Suppliers may not work while under the influence of alcohol, illegal drugs, or prescription or over-the-counter drugs that impair their mental or physical functions. Additionally, they may not use, possess, transfer, or sell illegal drugs or alcohol or misuse prescription or over-the-counter drugs during working hours or on Hecla premises.

# **Business Integrity & Ethics**

We expect our Suppliers to comply with the same laws and policies that Hecla applies to all of its employees and contractors.

### **Anti-Corruption**

Suppliers must comply with all applicable anticorruption laws, including, (a) the Foreign Corrupt Practices Act of the United States, (b) the Canadian Corruption of Foreign Public Officials Act, and (c) local laws in the jurisdictions in which they operate. These prohibit the provision or offering of anything of value to government officials, representatives, political parties or third parties for the purpose of influencing any act or decision in violation of the recipient's lawful duty or securing or attempting to secure an improper legal or commercial advantage. They also require the operation of effective controls and the maintenance of accurate books and records.

### **Antitrust**

Suppliers must not engage in any collusive bidding, price fixing or other unfair trade practices. Suppliers must comply with all applicable competition/antitrust laws and other laws intended to promote free and fair competition.

### **Environment**

Suppliers must meet all environmental laws where they operate and actively manage any environmental risks due to their activities. In addition, Suppliers must comply with Hecla's Environmental Policy during the course of any visit to, or operations on, a Hecla site and also must:

- Obtain and keep current all required environmental permits and registrations
- Comply with all applicable environmental laws and regulations when conducting
  work at any of Hecla's sites, including those for water and air emissions, pollution
  controls, hazardous materials, chemical and waste management

• Immediately report any environmental incidents, including spills

# **Human Rights**

Hecla expects its Suppliers to uphold the highest standards of human rights, and are prohibited from engaging in human trafficking, forced labor, or child labor. We also ask our Suppliers to commit to respect these fundamental human rights both with their own employees and within any subcontractor operations and supply chains.

# Wages & Working Hours

Suppliers are expected to ensure timely and fair payments of wages and benefits to any employees, sub-contractors, and sub-suppliers and in full compliance with applicable local and national wage and hour laws.

#### Discrimination

Suppliers should not discriminate against any employee because of race, color, religion, national origin, sex, sexual orientation, gender identity or expression, age, or physical or other disability. We expect our Suppliers to support equal employment opportunity policies and to adhere to all applicable laws, including applicable employment laws.

### Harassment

We expect our Suppliers to promote a positive and productive work environment in which every employee and contractor feels respected and valued.

### **Conflicts of Interest**

No Supplier may, directly or indirectly, use his or her relationship with Hecla to obtain a personal benefit from any sale, purchase or other activity of Hecla. Suppliers must alert Hecla immediately if they become aware of any situation that is or could create a conflict of interest or the perception of a conflict of interest.

### **Insider Trading**

Suppliers must comply with all federal and state securities laws and regulations. In addition, Suppliers who are aware of material information regarding Hecla which has not been disclosed to the public (i.e., facts which may affect the market price for that company's securities and investors' decisions to trade therein) must hold that information in strictest confidence and refrain from buying or selling or influencing the decisions of others (i.e., "leaking" or "tipping") to buy or sell the securities of any such company until such information has been publicly disclosed and enough time has elapsed to allow investors to react to the information.

### Confidentiality

Suppliers must maintain all proprietary or confidential information of Hecla in the strictest confidence.

# **Gifts and Entertainment**

Suppliers may provide gifts of nominal value as identified in Hecla's Code of Conduct. Suppliers must not provide any personal gifts, favors or other compensation to a Hecla employee that are intended to influence, or appear to influence, a business decision. If a Hecla employee or family member of an employee receives an unsolicited gift from a Supplier that is prohibited by Hecla's Code of Conduct, that person must promptly report the gift to the Chief Executive Officer or General Counsel and return the gift

# **Compliance with Code**

We expect our Suppliers to be aware of this Suppliers Code and to ensure that its employees and representatives understand and comply with it. They must also provide reasonable assistance to Hecla during the course of any investigation into the Suppliers compliance with this Supplier Code. Failure to adhere to this Supplier Code may be grounds for termination of the Supplier relationship with Hecla and any related agreements.