

# Whistleblower Policy

## 1. Purpose

Endeavour Silver Corp., and its subsidiaries (“Endeavour”, the “Company” or “we”) requires its directors, officers, employees, contractors, consultants and third parties working or acting on Endeavour’s behalf (collectively, “Company Representatives”) to observe high standards of professionalism and ethical conduct. This commitment is reflected in our Code of Business Conduct and Ethics (the “Code”) which reflects Endeavour’s culture of honesty, integrity and accountability and outlines the basic principles and policies with which everyone at the Company is expected to comply.

The purpose of this policy (the “Policy”) is to establish procedures:

- (a) for the receipt, retention and treatment of complaints received by Endeavour regarding:
  - (i) the accuracy, fairness or appropriateness of any of the Company’s accounting policies or financial reports (“Accounting Irregularities”); or
  - (ii) violations or suspected violations of laws, governmental regulations or the Company’s Code (“Workplace Concerns” and together with Accounting Irregularities, “Concerns”); and
- (b) regarding the submission by the Company Representatives, on a confidential and anonymous basis, of Concerns.

The Audit Committee of the Company (the “Audit Committee”) is responsible for ensuring that a confidential and anonymous process exists whereby persons can express any concerns or complaints about the accuracy, fairness or appropriateness of any of the Company’s Accounting Irregularities. The Company has designated the Business Ethics Advisor to be responsible for overseeing procedures for the receipt, retention and treatment of reports or concerns received by the Company regarding Workplace Concerns.

This Policy describes how to report any Accounting Irregularities as well as any other known or suspected Workplace Concerns.

## 2. Scope & Responsibilities

This Policy applies to all directors, officers, employees, contractors, consultants and work partners of Endeavour.

## 3. Policy

### No Retaliation

Any Company Representative who in good faith reports a Concern shall not suffer harassment, retaliation or adverse employment consequence. Every supervisor has the responsibility to create an environment in which Company Representatives can submit Concerns without fear of retaliation. Any Company Representative who retaliates against someone who has reported a Concern in good faith is subject to discipline up to and including termination of employment. This Policy is intended to encourage and enable Company Representatives and others to raise serious Concerns within the Company rather than seeking resolution outside the Company. Any individual who is concerned about retaliation or has experienced retaliation should contact the Trust Line immediately (contact information set out in Schedule A attached to this Policy). Matters involving possible violation of laws or regulations may also be brought to a relevant governmental regulatory authority. However, Endeavour is committed to taking internal action in response to concerns by a Company Representative, and would appreciate the opportunity to do so, if appropriate.

### Reporting Violations

It is the responsibility of all Company Representatives to report all Concerns in accordance with this Policy through their supervisors, Company's senior management, Human Resources, or through a confidential anonymous process described below. The Company maintains an open-door policy and suggests that Company Representatives share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, a Company Representative's supervisor is in the best position to address an area of concern. A Company Representative's supervisor may be more knowledgeable about the issue and will appreciate being brought into the process. It is the supervisor's responsibility to help solve the problem.

However, if any Company Representative is not comfortable speaking with supervisors, Company's senior management or Human Resources, the Company Representative is encouraged to report Concerns through the Company's Trust Line, which is administered by an independent, third-party supplier that has been selected to provide a confidential and anonymous communication channel for submitting reports.

The contact information for the Trust Line, as well as the Chair of the Audit Committee, and the Business Ethics Advisor, all of which are alternative independent reporting contacts ("Reporting

Contacts”), are listed in Schedule A attached. Questions or violation reports can be submitted in Spanish or English. The Company Representatives may choose to provide their name and contact details with the report, or report anonymously.

Company Representatives acting in good faith and reporting any Concerns should report it as described in this Policy. Examples of Concerns that should be reported include any:

- (a) accounting and auditing irregularities, including any fraud or deliberate error in any financial statements of Endeavour;
- (b) non-compliance with internal controls;
- (c) falsification of Company records;
- (d) violation of any applicable law, rule or regulation, including those relating to corporate reporting and disclosure;
- (e) fraud, money laundering, bribery or corruption, misappropriation of funds or other dishonest behaviour;
- (f) practice or behaviour that poses a serious risk to the health and safety of any individual, public health and safety, or to the environment;
- (g) insider trading or any unauthorised disclosure of confidential or proprietary information;
- (h) discrimination, bullying or harassment of any description and including retaliation against whistleblowers;
- (i) violation of the Code or any policy of Endeavour, including specifically our Anti-Bribery and Anti-Corruption Policy;
- (j) conflict of interest; and
- (k) illegal conduct, including theft, dealing in or using illicit drugs, violence or threatened violence and criminal damage against property.

Notwithstanding the foregoing, nothing contained in the Code or this Policy limits a Company Representative’s ability to file a charge or complaint with a governmental regulatory agency, and nothing herein limits their ability to communicate with any such agencies or otherwise participate in any investigation or proceeding that may be conducted by any such agency, including providing documents or other information, without notice to Endeavour.

## Investigations of Complaints

Please use any of the Reporting Contacts listed on Schedule A to report Concerns. The Reporting Contacts are independent of management and any reports will be completely confidential.

## Accounting Irregularities and Auditing Matters

Pursuant to its Charter, the Audit Committee is responsible for addressing any Accounting Irregularities and all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Chief Financial Officer of the Company is required to immediately notify the Audit Committee of any complaint of which such officer is aware and to work with the Audit Committee until the matter is resolved. Each calendar quarter, Accounting Irregularities from the preceding period are summarized and reported.

## Workplace Concerns

Pursuant to its Charter, the Corporate Governance and Nominating Committee is responsible for reviewing management's monitoring of compliance with the Code. The Business Ethics Advisor is required to notify the Corporate Governance and Nominating Committee of any Workplace Concerns of which such advisor is aware and to work with the reviewers until the matter is resolved.

## Acting in Good Faith

Anyone filing a complaint related to any Concerns must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a Concern. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offence. Disciplinary action, up to and including termination of employment or services, may be taken against a Company Representative who knowingly makes a false report.

## Confidentiality

Complaints or submissions related to any suspected Concerns may be submitted on a confidential basis by the complainant or may be submitted anonymously. All complaints or submissions will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

## Handling of Reported Violations

The Chair of the Audit Committee or the Business Ethics Advisor, as applicable, will notify the sender and acknowledge receipt of the reported Accounting Irregularities or Workplace Concerns

as soon as possible. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

The Company shall retain records of complaints for a period of no less than 10 years as a separate part of the records of the Audit Committee or Corporate Governance and Nominating Committee, as applicable.

## Privacy Violations

In addition to submitting Concerns internally to the Company, the Personal Information Protection and Electronic Documents Act (Canada) (“PIPEDA”) and the Personal Information Protection Act (British Columbia) (“PIPA”) provide that any person who has reasonable grounds to believe that there has been a contravention of either of PIPEDA or PIPA may notify the relevant Privacy Commissioner.

An organization must not dismiss, suspend, discipline, harass or otherwise disadvantage an employee or deny an employee a benefit because the employee, acting in good faith and on the basis of reasonable belief has disclosed to the Privacy Commissioner that the organization has contravened or is about to contravene either of PIPEDA or PIPA. Members of the public may lodge anonymous complaints to avoid the possibility of retaliation.

Endeavour should not disclose information that might impair its own competitive effectiveness, violate the privacy rights of employees, other individuals, or institutions, or that is confidential information of other parties in accordance with all applicable legislation of the jurisdiction where the Company operates.

### 1. Related Policies

- Code of Business Conduct and Ethics
- Anti-Bribery and Anti-Corruption Policy

### 2. Revisions

Last updated and approved by the Board on July 30, 2024.

## Schedule “A” Reporting Contacts

Concerns can be reported using one of the following methods.

### I. Company’s Trust Line

You can make a report either online, by phone or by email, using our Trust Line hosted by an independent third party.

#### A. Online: [www.endeavourtrustline.com](http://www.endeavourtrustline.com) or [www.edrlineadeconfianza.com](http://www.edrlineadeconfianza.com)

Please type in ‘Endeavour’ as the company name, write your report and categorize the Accounting Irregularities or Workplace Concerns.

#### B. By phone:

Please call one of the following numbers. You can talk to an operator or choose to leave a voicemail if you prefer not to speak to an operator:

Canada & U.S.: 1-866-921-6714

Mexico: 800-681-8202

#### C. By email:

Please write to: [endeavour@integritycounts.ca](mailto:endeavour@integritycounts.ca)

When a Company Representative files a report, through the Company’s Trust Line system, it will provide a reference number and password to facilitate confidential follow up on the report. If more information is required regarding the report, Endeavour may contact the Company Representative through the Company’s Trust Line system. The Trust Line allows for anonymous dialogue between the Company Representative and Endeavour. If the Company Representative has provided a name and contact details with the report, the Company Representative may be contacted directly for further assistance.

## II. Accounting Irregularities to Chair of the Audit Committee

If you wish to discuss any Accounting Irregularities with the Chair of the Audit Committee. The Audit Committee Chair may be contacted for Accounting Irregularities at:

Email : [auditcommittee@edrsilver.com](mailto:auditcommittee@edrsilver.com)

Mail : Endeavour Silver Corp., Suite 1130 - 609 Granville Street, PO Box 10328, Vancouver, BC, V7Y 1G5, Canada. Attention: Chairman of the Audit Committee.

## III. Workplace Concerns to the Business Ethics Advisor

Any other Workplace Concerns with the Business Ethics Advisor, please indicate this in your report. The Business Ethics Advisor may be contacted for Workplace Concerns at:

Email: [ethics@edrsilver.com](mailto:ethics@edrsilver.com)

Mail: Endeavour Silver Corp., Suite 1130 - 609 Granville Street, PO Box 10328, Vancouver, BC, V7Y 1G5, Canada. Attention: Business Ethics Advisor.

Reports submitted online or by phone through the Company's Trust Line are received by an independent service provider and then forwarded on a confidential and anonymous basis, if required (except where prohibited by law) to the Audit Committee Chair or Business Ethics Advisor.