SUPPLIER CODE OF CONDUCT

1. INTRODUCTION

Aris Mining Corporation (the "**Company**") intends to conduct business with integrity. To that end, the Company has adopted a Business Conduct and Ethics Policy and an Anti-Bribery and Anti-Corruption Policy (together, the "**Code of Conduct**") that must be adhered to by all employees, officers and consultants working on its behalf.

References to the Company in this Supplier Code of Conduct include all of its subsidiaries and any other entity controlled by the Company. Suppliers represent a key component of the Company's performance and are expected to share the Company's belief in the importance of integrity and its concern over the potential for misconduct in business practices.

Suppliers are required to read, understand and comply with both the Company's Code of Conduct and this Supplier Code of Conduct. A supplier's commitment to full compliance with this Supplier Code of Conduct is the foundation of a mutually beneficial business relationship with the Company. This Supplier Code of Conduct is based on the principles in the Company's Code of Conduct and provides more detailed guidance as to standards of conduct the Company expects from its suppliers.

Suppliers' employees should be informed of the existence and contents of this Supplier Code of Conduct. Suppliers should also ensure that any vendors or third parties that they use who are involved in providing products or services to the Company adhere to the principles in this Supplier Code of Conduct. Suppliers should not retaliate or take disciplinary action against any Supplier employee or other associated person who has, in good faith, reported violations of this Supplier Code of Conduct, or who has sought advice regarding this Supplier Code of Conduct.

2. RESPONSIBILITIES OF SUPPLIERS

The core standards that the Company expects from its suppliers include, but are not limited to, the following:

(a) **Legal and Regulatory Compliance:** Suppliers must comply with all applicable laws, rules, and regulations of the places where they do business. If any law, rule or regulation conflicts with this Supplier Code of Conduct, the supplier should bring such conflict to the immediate attention of the Company.

(b) **Forced and child labour:** Suppliers must not use forced or involuntary labour of any type (e.g., forced, bonded, indentured or involuntary prison labour). Suppliers must not employ any person below the local legal minimum age (in the country where work is performed), except as permitted by applicable law in connection with a recognized professional apprenticeship program.

(c) **Human Rights:** Suppliers must:

i. Respect the human rights of its employees.

ii. Observe applicable laws and regulations governing wage and hours.

iii. Allow workers to freely choose whether or not to organize or join associations for the purpose of collective bargaining as provided by local law or regulation.

iv. Prohibit discrimination, harassment and retaliation.

(d) **Environment:** Suppliers must take the necessary steps to protect the environment in the various regions of the world in which they operate. At a minimum, suppliers must comply with all applicable environmental laws, regulations and sound industry practice, such as requirements regarding chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits and environmental reporting.

(e) **Health and Safety:** Suppliers must provide employees with a safe and healthy working environment in accordance with applicable laws and industry standards, with access to adequate health and safety training. Suppliers must have in place health and safety policies and standards designed to reduce work-related injury and illness, and promote the general health of employees. These policies must be made available to all of the suppliers' employees. On Company sites, suppliers must comply with Company regulations and policies.

(f) **Conflicts of Interest:** Suppliers and their employees must avoid creating actual or apparent conflicts of interest. Any concern about a transaction, relationship, or other circumstance that creates or could create a conflict of interest should promptly be reported to the Company.

(g) **Insider Trading:** Suppliers may not trade in Company securities on the basis of non-public information concerning the Company, nor "tip" others who may trade in the Company's securities. Suppliers should understand that they may well be considered "insiders" under relevant securities and criminal laws and can face severe civil and criminal prosecutions for use of insider information.

(h) **Confidentiality:** Suppliers must strictly adhere to all confidentiality obligations regarding any non-public information, including unpublished data and reports.

Suppliers must ensure the confidentiality of confidential information continues even after the supplier/Company relationship ends. Contracts with suppliers must include Company standard terms and conditions concerning confidentiality obligations**.**

(i) **Business Entertainment and Gifts:** Suppliers may offer business entertainment and gifts of moderate value as long as it is related to a legitimate business purpose and is lawful such as for the purposes of creating goodwill and sound working relationships. The Company strictly prohibits any person to give, authorize, offer, promise, request, agree to receive or receive gifts, hospitality and entertainment which serve to improperly influence or reward any acts or decisions or as an actual or intended *quid pro quo* for any benefit.

(j) **Foreign Public Officials and Facilitation Payments:** Suppliers must at all times comply with the principles described in the OECD's Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, and the Convention's Commentaries (see: https://www.oecd.org/corruption/oecdantibriberyconvention.htm), and all other applicable laws related to preventing bribery. Specifically, suppliers may not give, promise to give, or offer to give, anything of value, directly or indirectly, to governmental officials, political candidates, or political parties in order to obtain or retain business or reward or induce the performance of services and must not make any facilitating payments to officials to secure the performance of their duties. Bribery or kickbacks are strictly prohibited.

(k) **Anti-Money Laundering Compliance:** Suppliers must comply with all applicable laws and regulations pertaining to the detection, prevention, and reporting of money laundering and the financing of terrorism.

(l) **Sanctions Compliance**: Suppliers must comply with all applicable sanctions laws and regulations and, without limitation of the foregoing, must not conduct any Company-related business with persons designated as subject to applicable sanctions or companies that are owned by such designated persons. Suppliers also must not purchase goods or services from sanctioned countries if prohibited by sanctions laws and regulations. Suppliers must immediately inform the Company of any possible violations of applicable sanctions laws or regulations that relate, directly or indirectly, to the Supplier's business with the Company.

(m) **Management of Sub-suppliers:** Suppliers must manage their sub-tier suppliers in accordance with the same principles outlined in this Supplier Code of Conduct.

(n) **Cybersecurity and Data Protection:** Suppliers must use commercially reasonable efforts to establish and maintain systems, processes and management oversight designed to prevent unauthorized access to and maintain the security of the supplier's own information systems and network, and to help prevent

unauthorized access to the Company's information systems, networks and information in accordance with industry standards and applicable law and regulation. Company confidential information and personal data must always be kept confidential and not used for any purpose other than the business purpose for which it was provided. Suppliers must comply with applicable privacy and data protection laws.

3. VIOLATION OF THIS SUPPLIER CODE OF CONDUCT

If a supplier does not comply with this Supplier Code of Conduct, the Company reserves the right to hold such supplier accountable for any loss, costs, damages or fine incurred and the reasonable costs of investigating non-compliance and to terminate the supplier relationship.

This Supplier Code of Conduct will be reviewed and updated whenever there is a change that affects its effectiveness in preventing unlawful activity.

Approved by the Board of Directors on November 4, 2026