

## SUPPLY CHAIN POLICY

### 1. Objective

Our objective is to ensure that our employees and suppliers live up to our values and commitments to operate as an ethical and responsible mining company. We will achieve this by integrating our supplier requirements throughout our procurement processes, and by assessing and monitoring our suppliers for their capabilities and performance in delivering quality goods and services at fair prices and in managing the related environmental, social and governance (ESG) risks and impacts.

We recognize the critical importance of our suppliers to our success as a company. We expect our suppliers to adhere to the requirements outlined in this policy.

A safe and responsible supply chain can be achieved by upholding key principles that we value, including integrity, respect, collaboration, communication, care, and performance

### 2. Scope

ESG risks and impacts in the supply chain can relate to human rights and labour, community and Indigenous peoples, the environment, business ethics, and health and safety, among other topics. Relevant risks and impacts will depend on the nature of the goods or services provided.

This policy applies to any suppliers of i-80 Gold Corp. (the “**Company**” or “**i-80**”) and their business activities related to the supply of goods and services provided to the Company. We expect our suppliers to take reasonable measures to apply these requirements within their own supply chains. This policy also applies to all entities under the Company’s control or management and all phases of the mine life cycle including exploration, design, construction, operation and closure.

### 3. i-80 Gold Corp. Commitments

- a) Ensure our employees and suppliers are aware of our business and ESG commitments and expectations, as outlined in this policy, our *Code of Business Conduct & Ethics*, and other relevant corporate policies and standards.
- b) Formalize our approach to supplier onboarding and due diligence in corporate policies, procedures and contract documents, and support implementation through training.
- c) Ensure that our employees conduct sourcing and procurement activities in a fair and transparent manner.
- d) Identify and assess ESG risks in our supply chain and manage and monitor these risks throughout the procurement process.
- e) Assess our suppliers for their capacity to manage ESG risks relevant to their scope of work and monitor their performance, including through conducting audits as required and addressing non-compliances.



- f) Support or enable access to employee grievance mechanisms for supplier workers. Address adverse impacts in our supply chain to which we have caused, contributed to or are linked to, based on the *UN Guiding Principles on Business and Human Rights*.
- g) Provide and support access to opportunities for local businesses and build their capacity.
- h) Establish management and site responsibilities for implementing this policy, regularly assess the effectiveness of supplier due diligence processes, and report to the Health, Safety, Environment & Sustainability Committee of i-80 Gold's Board of Directors and externally on our progress.

#### **4. Supplier Requirements**

##### *Integrity and Ethics*

Comply with all applicable laws and regulations in relevant jurisdictions. Understand and comply with this policy, i-80 Gold's *Code of Business Conduct & Ethics*, and any other contract provisions.

Adhere to the *Foreign Corrupt Practices Act* (United States) and the *Corruption of Foreign Public Officials Act* (Canada), which make it illegal to provide anything of value to foreign officials to get or keep business or to obtain any other business advantage. Maintain proper financial controls and accurate records. Avoid conflicts of interest. Comply with international trade laws in respect of countries, individuals or organizations that are subject to embargoes or sanctions.

The Company is actively seeking to employ a third-party risk management program to onboard and monitor suppliers to mitigate any risk in relation to sanctions, anti-bribery and anti-corruption laws, and human rights laws.

##### *Health and Safety*

Comply with i-80's *Health and Safety Policies*. Implement a health and safety management systems that complies with national, federal and state laws and regulations, as well as the Company's corporate and site policies and procedures.

Identify and assess workplace risks, provide appropriate training and personal protective equipment to workers, and provide accurate reporting to the Corporation on workplace health and injuries.

##### *Environment*

Comply with i-80's *Environment, Sustainability and Governance Policy*. Implement an environmental management system that complies with national, federal and state laws and regulations, and i-80's policies and procedures.

Apply the precautionary principle. Work towards continual improvement in environmental management.

##### *Human Rights and Labour*

Uphold internationally recognized human rights, as expressed in the International Bill of Human Rights and the International Labour Organization's *Declaration on Fundamental Principles and Rights at Work*.



Prohibit forced labour and child labour, prevent harassment and abusive behaviour, eliminate discrimination and ensure equal access to opportunities, and respect the right to freedom of association and collective bargaining.

Implement fair working conditions, working hours and provide fair and timely compensation.

Ensure that workers understand their rights and working conditions, and that they have access to an effective mechanism for addressing work-related complaints.

Where relevant human rights are prohibited or restricted under law, seek to uphold the rights to the extent possible within the law.

#### *Communities and Indigenous Peoples*

Establish and maintain respectful and productive relationships with communities and coordinate with i-80 on engagement and grievances.

Provide and support access to employment and procurement opportunities for communities and Indigenous groups.

#### *Product Safety and Quality*

Meet or exceed applicable laws and regulations as well as contractually agreed quality and safety requirements for products.

#### *Reporting Violations*

Report any violations of this policy to the Company through appropriate channels or refer to the Company's *Whistleblower Policy*.

### **5. Review of Policy**

The Corporate Governance & Nominating Committee will review and evaluate this Policy on an annual basis to determine whether it remains current with evolving industry norms and practices and is otherwise effective in supporting our objective of ensuring our employees and suppliers live up to our values and commitments to operate as an ethical and responsible mining company.

Approved, Amended  
and Restated:

Corporate Governance & Nominating Committee  
Board of Directors

Date:

March 31, 2025