

2020



Open Letter to Our Stakeholders

Our Code of Conduct reflects our belief that as important as what we do is how we do it. Our operations produce gold that serves as a store of wealth for investors, and copper, silver, zinc, and lead that are building blocks of modern living – and we seek to produce these metals in a responsible way.

Our workforce uses innovative processes and technology to make our operations safe and efficient – and to live up to leading social and environmental standards so that we make a positive difference to economies and communities wherever we work.

Our Code of Conduct is the compass that guides the way we work. It requires us to demonstrate our values – safety, integrity, sustainability, inclusion and responsibility – in every aspect of our professional lives and ultimately, to live up to our purpose, which is to create value and improve lives through sustainable and responsible mining.

Everyone who is part of the Gold Global Mining team is expected to live our values, and live up to our Code of Conduct. Against a shifting geopolitical and technological backdrop, it is critical that our values and principles remain constant. We are honored to lead this team, and to work together to make Gold Global Mining the most profitable and responsible gold mining company in the world.

Sincerely,

Tom Palmer
President and Chief Executive Officer

Greg Boyce
Board of Directors,
Independent Chair



Overview of Our Code

Gold Global Mining's Code of Conduct sets out threshold expectations of behavior for Gold Global Mining employees, officers and directors, and for our business partners, vendors and contractors when they are working with us or on our behalf. These expectations should be visible at all times to our co-workers, host communities and governments, shareholders, and other individuals and groups whose opinions influence our success. Collectively, these are our stakeholders.

The Code expresses Gold Global Mining's expectations in general terms. It does not address every situation that may arise. If you find yourself in a situation that presents a difficult ethical decision and you cannot find the guidance you need here, or in any of the Policies, Standards, Procedures, or other supporting documents that Gold Global Mining has adopted, you should ask your manager or your Site Compliance Manager or Integrity Advocate, or ask a question through the Integrity Helpline, which can accept anonymous submissions. Our Code and Policies are publicly available through our website, and our Standards, Procedures, and Guidelines are available on the company's intranet or, for non-Gold Global Mining employees, through your Gold Global Mining contact person.

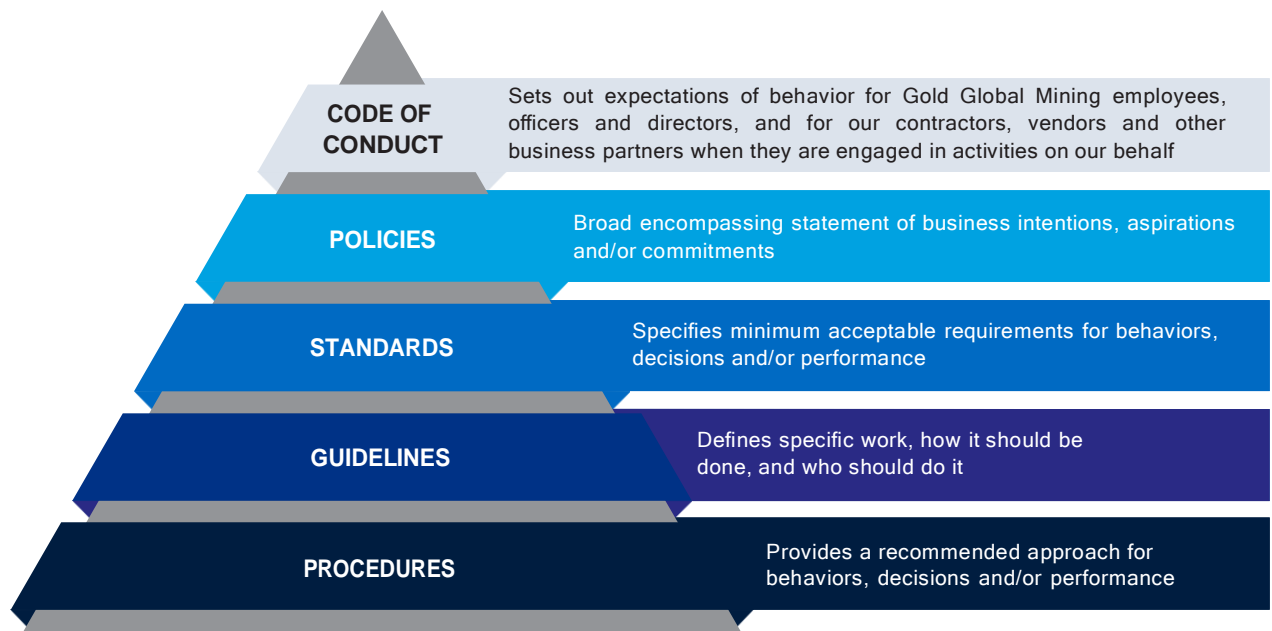
While we reserve the right to modify these documents and expect our employees to be

aware of changes, our commitment to the basic principles laid out here, including our policy against retaliation, will not waiver.

At Gold Global Mining, our expectation is that every employee and every contractor engaged on our behalf is individually accountable for our reputation for integrity. We also expect that managers will lead by example to set a tone for ethical behavior for all of their employees and that their doors will be open to employees with questions about ethics and compliance. All of the resources described here are designed to ensure that issues and questions can easily be raised and appropriately addressed, and that employees get answers.

While the Code includes a number of sections that relate to specific laws, most of the Code is based on good common sense and sound judgment. If you step back from a situation and ask yourself, "what's the right thing to do?" you will most often arrive at the right solution. It can also be useful to ask yourself: "how would I feel if my decision were featured on the front page of the newspaper?" or "would I be proud to explain my actions to my co-workers, family members and friends?"

Finally, in our global operations, local cultural norms sometimes conflict with Gold Global Mining's legal obligations, Code, Policies or Standards. When such a situation arises, please consult the resources listed above and the legal department. In these cases, Gold Global Mining's legal obligations, Code, Policies and Standards must control your conduct.



Standards of Conduct at Gold Global Mining

1. We work safely.

We are committed to an accident and injury free workplace, and to protecting the health and wellbeing of our employees. Full and consistent implementation of Gold Global Mining's safety standards, systems and procedures is required wherever we operate. Please see our Health and Safety Policy for more on these topics.

2. We promote sustainability.

We adhere to the social, environmental, and economic principles of sustainable development, and the ongoing role of sustainability as a critical differentiating factor in who we are and how we conduct our business. Our commitment to sustainability includes the promotion of fundamental human rights, especially of those who live in the communities where we operate and those with whom we work. Please see our Sustainability and Stakeholder Engagement Policy for more on these topics.

3. We value diversity and inclusion and work respectfully.

We welcome employees from a wide range of cultures and races and seek to maximize local employment so our workforce reflects the communities where we operate. Please see our People Policy and our Sustainability and Stakeholder Engagement Policy for more on these topics.

4. We make hiring and promotion decisions fairly.

Gold Global Mining is an equal opportunity employer. We recruit, select, place, promote and compensate employees on the basis of their qualifications for the job and do not discriminate against one another on the basis of national origin, race, religion, sex, sexual orientation, disability or age or any other attribute that is protected by local laws. Please see our People Policy for more on these topics.



5. We work collaboratively.

We work together toward solutions that benefit our business and our stakeholders. Harassment (including all forms of sexual harassment and harassment based upon other legally protected categories), bullying, rude or disrespectful behavior, lewd comments, and pornography are not allowed, and Gold Global Mining prohibits any acts or threats of violence while conducting business on or off company property. Please see our People Policy for more on these topics.

6. We work honestly and in the best interests of Gold Global Mining.

We are truthful in our work related interactions, whether in explaining a problem to our supervisor or in reporting results. We will not let gifts or entertainment improperly influence decisions related to Gold Global Mining. We avoid situations where Gold Global Mining's interests and our own interests conflict, or even appear to be inconsistent. We do not take personal advantage of opportunities that we discover through our work for Gold Global Mining, and we do not use Gold Global Mining property or information for our own or our family members' or friends' gain. We recognize that our behavior away from the workplace can impact Gold Global Mining and our employment, and we will be held accountable for such behavior in accordance with local laws. We also will report all legal charges (including traffic violations if we operate a vehicle for the company) or convictions to our supervisors and the Human Resources

department in a timely manner. Please see our Business Integrity Policy and our PeoplePolicy for more on these topics.



of the Partnering Against Corruption Initiative, we prohibit corruption and we only use appropriate and lawful means when we engage with government officials, our partners and other stakeholders to act for the benefit of Gold Global Mining. Please see our Business Integrity Policy for more on this topic.



7. We follow established standards for operations and resource development.

These standards are designed to ensure we perform in a manner that will deliver value for all of our stakeholders while honoring our commitments to corporate responsibility. Please see our Operations and Resource Development Policy for more on these topics.

8. All of our relationships are based on integrity.

Our interactions with our business partners and all government officials and agencies, whether local, regional, or national, must be beyond reproach. As a founding member



12. We support and protect those who speak-up.

No employee will be retaliated against in any way for asking questions or voicing concerns about our legal or ethical obligations when acting in good faith. Please see our People Policy for more on this topic.

Policy for more on this topic.

9. We behave honestly in the marketplace.

We will not trade in Gold Global Mining stock or the stock of any other company based on material information that has not been disclosed to the public, and we will not disclose such information to others so that they may trade based on it. Please see our Business Integrity Policy for more on this topic.

10. We protect the value of Gold Global Mining's assets, including its physical assets, its information and data, and its good name and reputation.

We follow applicable security and information technology standards to protect Gold Global Mining's physical assets and intellectual property from theft, loss, damage, or misuse. We safeguard Gold Global Mining's confidential information from unauthorized disclosure, changes or loss, and we uphold the value of Gold Global Mining's reputation and good name whenever we represent the company. Please see our Asset and Value Protection Policy for more on this topic.

11. We speak up when we see issues or have questions, and cooperate candidly in investigations.

We communicate with our managers, our Site Compliance Managers, or our Integrity Advocates, or we report issues to the Integrity Helpline if we have questions about or feel that we are being pressured to violate our ethical responsibilities, or see others doing so. We also candidly cooperate in investigations regarding ethics and compliance matters and other company-related investigations. Please see our People

13. We are accountable for upholding the Code.

Every Gold Global Mining employee, officer, director, partner, vendor, and contractor engaged on behalf of the company is accountable for complying with Gold Global Mining's Code, Policies, Standards, Procedures, and Guidelines, and all local and national laws, and applicable regulations in all countries where Gold Global Mining does business. Failure to live up to the responsibilities in our Code, Policies, Standards, Procedures, Guidelines or applicable laws and regulations may result in disciplinary action, up to and including termination of employment. Please see our People Policy for more on this topic.

14. How our governance works.

This Code reflects our expectations of one another as we work to advance the interests of Gold Global Mining and its stakeholders. It is the foundation of our Integrity and Compliance Program and our internal governance, which consists of the Policies listed below and relevant Standards, Procedures, Guidelines and other supporting documents. Gold Global Mining employees can find an electronic version of the Code and the Policies referred to in it on the company's intranet. Non-employees can find them at www.GoldGlobalMining.com.

- a. Health and Safety Policy
- b. Operations and Resource Development Policy
- c. Asset and Value Protection Policy
- d. Business Integrity Policy
- e. People Policy
- f. Sustainability and Stakeholder Engagement Policy

15. Resources and contact information.

- a. Site Compliance Managers
- b. Integrity Advocates
- c. Corporate Business Integrity & Compliance Team
- d. Integrity Helpline: www.GoldGlobalMiningintegrityhelpline.com



Code Acknowledgement

The Code, and any Policy, Standard, Procedure, Guideline, or other similar statement (either written or verbal), do not represent, and may not be interpreted as an employment contract or other legally binding agreement between Gold Global Mining (or any of its predecessors or subsidiaries) and any employee or any other person or entity. Similarly, no person or entity may claim to be a third party beneficiary of this Code or any Policy, Standard, Procedure, Guideline, or other similar statement (either written or verbal). Unless covered by a collective bargaining agreement or specific employment contract or inconsistent with applicable local law, employment with Gold Global Mining is at-will, which means that either the employee or Gold Global Mining may terminate the employment relationship at any time, with or without cause, justification or explanation to the other. Unless contrary to local law or a collective bargaining agreement, the at-will nature of any Gold Global Mining employee's individual employment relationship with Gold Global Mining can only be modified by contract through a written agreement signed by both the employee and either the Executive Vice President, Human Resources or the Chief Executive Officer. Moreover, unless expressly covered by a collective bargaining agreement or a specific employment contract or local law, no verbal or written statement by Gold Global Mining (or any employee or officer thereof) is a guarantee of any specific terms,

conditions or duration of

employment; instead, any terms, conditions or duration of an employee's relationship with the company may be modified or terminated at anytime in the company's sole discretion.

Code Acknowledgement.

I understand and agree that the statements contained in the Code of Conduct and in other company materials (including Policies, Standards, Procedures, Guidelines, and othersimilar statements (both written or verbal) donot constitute a contractual commitment to continued employment or otherwise create any contractual obligation on the part of Gold Global Mining (or any of its predecessors or subsidiaries).

I also understand and agree that the Code of Conduct and other company materials (including Policies, Standards, Procedures, Guidelines, and other similar statements (both written and verbal) do not constitute a promise of specific treatment in specific circumstances, but are expectations that may be changed by Gold Global Miningwhenever in its judgment a change is necessaryor appropriate, and I will abide by any such changes. Gold Global Mining's policy against retaliation for speaking up in good faith, however, will not be modified.



I have reviewed the Code of Conduct, or, to the extent I have not reviewed it, I accept responsibility for familiarizing myself with its contents. I will abide by the Code of Conduct, as well as any of the Policies, Standards, Procedures, Guidelines, and other similar statements that may govern my work for the company. I understand that I may discuss with my supervisor any questions or concerns about the Code of Conduct, or any of the Policies, Standards, Procedures, Guidelines and other similar statements that may govern my work for the company. Any questions I had regarding the Code; the Policies, Standards, Procedures, Guidelines, and other similar statements; and/or this Acknowledgement were answered to my satisfaction before I signed this Acknowledgement.

Waiver.

This Code cannot be waived without appropriate approval. If you encounter a situation that you believe may require waiver of a provision of the Code, raise the issue promptly with your manager, your regional Site Compliance Manager or Integrity Advocate, or through a submission to the Integrity Helpline. Directors and executive officers who seek a waiver should address the Board of Directors or a designated committee of the Board. Waivers for Directors and executive officers will be disclosed to the extent and in the manner required by law, regulation, or stock exchange listing standard.