



SUPPLIER CODE OF CONDUCT

INTRODUCTION

The Ivanhoe Electric Inc. (“**Ivanhoe**” or the “**Company**”) Supplier Code of Conduct (“**Code**”) sets out the minimum standards of conduct expected to be adhered to by any individual, business, or other entity that provides goods or services (a “**Supplier**”) to Ivanhoe or any of its subsidiaries under terms specified in a contract.

This Code supplements the requirements, guidelines and standards of conduct described in other internal and external Ivanhoe policies. These may include Ivanhoe’s Code of Business Conduct and Ethics, Anti-Corruption Policy, Health, Safety and Environment Policy, Whistleblower Policy, as well as Terms and Conditions within any contract between the Company and Supplier. All Suppliers must review and comply with the Supplier Code of Conduct and all applicable Ivanhoe corporate policies which are available on the Company’s website at <https://ivanhoeelectric.com/about-us/corporate-governance/>.

OBJECTIVES

- To promote ethics and integrity within supply chain.
- To prevent illegal activities that could place Ivanhoe and its stakeholders at risk.
- To encourage sustainable development practices by Suppliers.
- To set expectations and evaluate Suppliers in compliance with this Code of Conduct and optimize Suppliers that add value to Ivanhoe operations.

SPECIFICS AND EXPECTATIONS OF THE CODE

This policy is designed to outline the standards and expectations for Suppliers regarding ethical behavior, compliance with laws, and sustainable business practices.

1. Compliance with Laws and Regulations

Legal Compliance

Suppliers must comply with all applicable laws, rules, and regulations in every authority (local, state, federal, and international) in which they do business with, or on behalf of Ivanhoe. Local laws may in some instances be less restrictive than the principles set forth in this Code. In those situations, Suppliers are expected to comply with this Code, even if the conduct they are contemplating would otherwise be legal under local laws. Compliance also includes health, safety, wellness and environmental laws and regulations.

Permits, Licenses, and Registrations

Suppliers must obtain and maintain all required permits, licenses, and registrations necessary for their operations.

2. Business Integrity

Standard for Business Integrity and Ethics

Suppliers must comply with the highest standards for business integrity and ethics. These standards must meet or exceed the requirements within Ivanhoe’s Code of Business Conduct and Ethics and other corporate policies.

Anti-Corruption

Suppliers must comply with the anti-corruption laws, directives, and/or regulations that govern operations in the countries in which they do business, such as the U.S. Foreign Corrupt Practices

Act, the Canadian Corruption of Foreign Public Officials Act, the U.K. Bribery Act, and the Organization for Economic Cooperation and Development (OECD) Convention on Combating Bribery of Foreign Public Officials in International Business Transactions and associated implementing legislation. Suppliers shall not offer or pay bribes, kickbacks, or other similar payments to any person, organization, or government official to secure improper advantages. This includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action, even in locations where such activity may not violate local law. We expect Suppliers to exert due diligence to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the hiring of agents or representatives. Suppliers must not offer any illegal payments to, or receive any illegal payments from, any customer, supplier, their agents, representatives, or others. The receipt, payment, and/or promise of monies or anything of value, directly or indirectly, intended to exert undue influence or improper advantage is prohibited. This prohibition applies even in locations where such activity may not violate local law.

Conflicts of Interest

We expect Suppliers to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with Ivanhoe. We expect Suppliers to promptly notify Ivanhoe if an actual or potential conflict of interest arises.

Gifts/Business Courtesies

We expect Suppliers to compete on the merits of their products and services. The exchange of business courtesies may not be used to gain an unfair competitive advantage. In any business relationship, Suppliers must ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation, and that these exchanges do not violate the rules or standards of the recipient's organization and are consistent with reasonable marketplace customs and practices.

Insider Trading

Suppliers must not trade or enable others to trade in Ivanhoe securities or securities of any other company while in possession of material, non-publicly disclosed information obtained during their business relationship with us.

3. Non-Discrimination and Harassment, Labor, and Human Rights

Fair Treatment

Suppliers must comply with standards of fundamental human rights and treat all employees with dignity and respect. Suppliers shall ensure they are not complicit in any human rights abuses in of their dealings with workers, community members and others affected by their activities while working with or on behalf of Ivanhoe. Suppliers shall ensure their commitment to the values of diversity and will not tolerate discrimination of any kind while working on behalf of Ivanhoe. Harassment, abuse, or any form of discrimination is prohibited.

Forced Labor

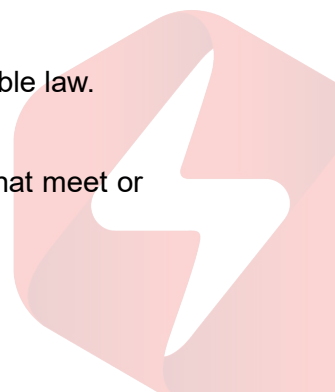
Suppliers will not use any form of forced, bonded, or indentured labor. Employment must be freely chosen.

Child Labor

Suppliers will not employ workers younger than the minimum age required by applicable law.

Wages and Benefits

Suppliers shall pay employees in a timely manner and provide wages and benefits that meet or exceed legal requirements.



Freedom of Association

Suppliers must respect the rights of employees to freely associate and bargain collectively.

4. Health, Safety, and Environmental Stewardship***Health & Safety Compliance***

Suppliers must provide a safe and healthy working environment. Suppliers shall have workplace and worksite policies, standards and procedures related to health, safety, and wellness. This includes proactive management of occupational health and safety hazards.

Environmental Compliance

Suppliers' policies shall follow strong requirements for environmental responsibility and that all activities are conducted in accordance with applicable laws and regulations.

Training

Suppliers must provide employees with appropriate health, safety, and environmental training and ensure that they are competent to perform their duties safely.

Hazardous Materials

Suppliers shall manage hazardous materials responsibly and ensure their safe handling, storage, and disposal.

Sustainable Practices

Suppliers are encouraged to adopt practices that minimize environmental impact, greenhouse gas emissions, and waste; controls pollution and efficiently utilize resources.

5. Community and Social Responsibility

Suppliers, in their capacity as provider of goods and/or services, are viewed as ambassadors of Ivanhoe and therefore must operate with the highest standards and maintain positive relationships with stakeholders and Ivanhoe's host communities.

Sub-Suppliers

Suppliers must ensure that their own suppliers and subcontractors adhere to standards consistent with this Code.

Conflict Minerals (where applicable)

Suppliers must ensure that products supplied to Ivanhoe do not contain minerals sourced from conflict-affected regions, in-line with international guidelines.

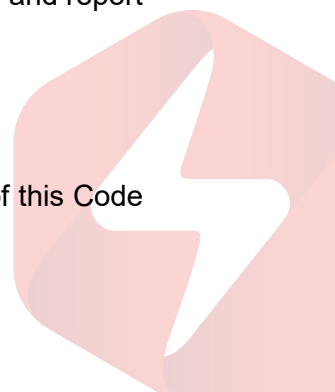
6. Information and Records

Suppliers may be exposed to certain information that is considered confidential by Ivanhoe for purposes of performing Supplier's work and shall not disclose such confidential information to any other person, unless specifically authorized by Ivanhoe.

Suppliers shall have internal accounting controls sufficient to prevent improper payments and shall maintain books, accounts and records that properly, fairly, and accurately record and report all transactions related, directly or indirectly, to its agreement with Ivanhoe.

7. Reporting Concerns***Whistleblower Protection***

Suppliers must provide mechanisms for employees to report concerns or violations of this Code without fear of retaliation.



Reporting Channels

Suppliers are expected to report suspected violations of the Code, Code of Business Conduct and Ethics and other corporate policies of Ivanhoe. Any Supplier who has reason to believe that a violation in connection with the Supplier's provision of goods or services to Ivanhoe must immediately report the suspected violation to Ivanhoe. Suppliers are expected to promptly investigate any allegations that their personnel have violated the Supplier Code of Conduct. Supplier personnel may also raise concerns about illegal or unethical behavior through Ivanhoe's third-party confidential and anonymous whistleblower service. Individuals may call the Company's Whistleblower Hotline at 1-844-680-3966 or use the web link: <https://secure.ethicspoint.com/domain/media/en/gui/48996/index.html> to report an Incident. The Hotline is available 24/7 and anonymous reporting is permitted.

8. Monitoring and Enforcement

Audits and Inspections

The Company may, at any time, conduct due diligence, establish reasonable controls, conduct audits or investigations to ensure a Supplier's compliance with this Code. In addition, Ivanhoe may require a Supplier to periodically review this Code and verify its compliance and understanding of the Code.

Corrective Actions

Suppliers must take prompt corrective actions to address any violations of this Code. Failure to do so may result in termination of the business relationship. If the Company believes a Supplier is not acting in accordance with this Code, it will take all actions it deems necessary, which may include providing the Supplier with a reorientation of applicable policies and procedures, implementing reasonable controls to assist the Supplier in realigning its activities, or terminating the services provided by such Supplier.

9. Product Quality and Safety, where applicable

Suppliers shall implement quality control processes to ensure that products or services meet safety, quality, and testing standards. If necessary, Supplier will address and rectify any issues related to product defects or safety concerns.

PREFERRED SUPPLIER SELECTION

We recognize the significant role our Suppliers play in achieving our operational, environmental, social and governance goals. This means Ivanhoe may adhere to a purchasing preference that favors the supplier with favorable policies. Suppliers may be evaluated and selected for their contribution that safeguard and lowers transactional risks for Ivanhoe throughout its operations, facilities, and worksites by meeting the criteria within this Code. Purchasing preferences may vary depending on individual factors in each purchasing scenario.

CONCLUSION

By adhering to this Code, Suppliers contribute to the responsible and sustainable operation of Ivanhoe. We value our partnership with Suppliers who share our commitment to ethical and sustaining business practices.

Approved by the Board of Directors on August 7, 2024

