

Assessment of Company Expectations 2025/26

Company adherence to the Expectations for EITI supporting companies

Company name	Ivanhoe Mines
Sector	Mining
Headquarters	Vancouver, Canada
Type	Publicly listed
Date of submission to company (month/year)	January 2026
PREAMBLE MSG Participation	<i>Pursuant to the Guidance on the Expectations for EITI supporting companies, companies are encouraged to participate in national EITI multi-stakeholder groups (MSGs). This data is collected for information purposes.</i>
Does the company participate in a multi-stakeholder group?	Yes
If yes, indicate in which countries the company is participating in MSGs?	DEMOCRATIC REPUBLIC OF THE CONGO
Secretariat comment on MSG participation	The Secretariat has verified that Ivanhoe Mines participates indirectly in the MSG in the Democratic Republic of the Congo. The Secretariat thanks the many companies directly and indirectly participating in MSGs in EITI implementing countries and encourages supporting companies to take part in MSGs in the EITI implementing countries in which they operate.
EXPECTATION 1 Public support for the EITI	<i>Publicly declare and publish support for the EITI and the objective of the EITI Association to make the EITI Principles and the EITI Standard the internationally accepted standard for transparency in the oil, gas and mining sectors.</i>

Does the company publish a statement of support for the EITI and the objective of the EITI Association?	Yes
URL for Statement Support	2024 Sustainability Report: https://www.ivanhoemines.com/wp-content/uploads/2024_Sustainability_Report.pdf
Secretariat's assessment on Expectation 1	Expectation met
Secretariat comment	Statement of support published. See URL p. 23.
EXPECTATION 2 <i>Disclosures in accordance with the EITI Standard</i>	<i>Make comprehensive disclosures in accordance with the EITI Standard in all EITI implementing countries where the company or its controlled subsidiaries operate. Where not disclosed in other company reporting, publicly disclose a list of controlled subsidiaries operating in the oil, gas or mining sectors in EITI implementing countries.</i>
Does the company publish a list of controlled subsidiaries?	Yes
URL for controlled list of subsidiaries	Annual Information Form 2024: https://www.ivanhoemines.com/wp-content/uploads/IVN_AIF_31-Dec-2024-vF.pdf Audited Financial Statements 2024: https://www.ivanhoemines.com/wp-content/uploads/20241231-00000-Ivanhoe-Mines-Ltd.-AFS-vF.pdf
EITI implementing countries where the company operates.	ANGOLA DEMOCRATIC REPUBLIC OF THE CONGO KAZAKHSTAN ZAMBIA
Does the company make disclosures in accordance with the EITI Standard or in relation to EITI implementing countries?	Yes

Secretariat's assessment on Expectation 2	Expectation met
Secretariat comment	Ivanhoe Mines discloses a list of controlled subsidiaries in the Annual Information Form 2024 p. 9 and the Audited Financial Statements 2024 p. 72- 74. See URLs. Company assessed as making disclosures in EITI implementing countries in accordance with the Standard.
EXPECTATION 3 <i>Disclosure of taxes and payments in non-EITI implementing countries</i>	<i>Publicly disclose taxes and payments to governments at a project level in line with the EITI Standard in all non-EITI implementing countries where the company operates unless disclosure is not feasible. Where not feasible, the country-specific legal or practical barriers to disclosure should be publicly explained.</i>
Does the company publicly disclose taxes and payments to governments in non- EITI implementing countries where the company operates upstream in the oil, gas and mining sectors?	Yes
URL to disclosures of taxes and payments to governments in non-EITI implementing countries	ESTMA Report 2024: https://www.ivanhoemines.com/wp-content/uploads/20241231-00000-Ivanhoe-Mines-Ltd-ESTMA-Reporting-template-vF.pdf Financial Statements Webpage: https://www.ivanhoemines.com/investors/investor-hub/
Are the disclosures disaggregated by project?	Yes
Secretariat's assessment on Expectation 3	Expectation met
Secretariat comment	Ivanhoe Mines discloses taxes and payments to governments in non-EITI implementing countries. See URL for ESTMA Report 2024 p. 3 and 5. The company discloses taxes and payments to governments disaggregated by project. See URL for ESTMA Report 2024.

	The Secretariat did not verify whether project-level disaggregation in all non-EITI implementing countries was adequate, as definitions vary across jurisdictions.
EXPECTATION 4 <i>Commodity trading transparency</i>	<i>Companies buying oil, gas and/or mineral resources from the state in EITI implementing countries, disclose volumes received and payments made in line with the EITI Standard and the EITI reporting guidelines for companies buying oil, gas and minerals from governments unless disclosure is not feasible.</i>
Does the company buy oil, gas, and/or mineral resources from the state in EITI-implementing countries?	No
If yes, which countries?	N/A
Does the company make disclosures in line with the EITI Standard and reporting guidelines?	N/A
URL for disclosure(s)	N/A
Secretariat's assessment on Expectation 4	Expectation not applicable
Secretariat comment	Ivanhoe Mines does not buy oil, gas and/or mineral resources from the state in EITI implementing countries.
EXPECTATION 5 <i>Disclosure of audited financial statements</i>	<i>In line with the EITI Standard, publicly disclose audited financial statements, or the main items (i.e., balance sheet, profit/loss statement, cash flows) where financial statement are not available.</i>
Does the company disclose its audited financial statements?	Yes
URL audited financial statements	Audited Financial Statements 2024: https://www.ivanhoemines.com/wp-content/uploads/20241231-00000-Ivanhoe-Mines-Ltd.-AFS-vF.pdf

Secretariat's assessment on Expectation 5	Expectation met
Secretariat comment	Ivanhoe Mines publishes audited financial statements. See URL.
EXPECTATION 6 <i>Beneficial ownership transparency</i>	<i>Publicly declare and publish support for beneficial ownership transparency and publicly disclose beneficial owners in line with EITI Standard, recognising that listed companies will disclose the name of the stock exchange, include a link(s) to stock exchange filings where they are listed and otherwise do what is required by applicable regulations and listing requirements.</i>
Does the company publish a statement of support for beneficial ownership transparency?	Partial
URL for statement of support for Beneficial Ownership	Sustainability Report 2023: https://www.ivanhoemines.com/wp-content/uploads/2023_Sustainability_Report.pdf
Does the company disclose beneficial owners, either directly or according to stock exchange regulations and listing requirements?	Yes
Where disclosures are made according to stock exchange regulations, please provide the name of the stock exchange	Toronto Stock Exchange, OTCQX Best Market
URL to stock exchange	TSX: https://money.tmx.com/en/quote/IVN OTCQX Best Market: https://www.otcmarkets.com/stock/IVPAF/overview
URL for recent beneficial ownership disclosures	2024 Management Proxy Circular: https://www.ivanhoemines.com/wp-content/uploads/2024_mngt_proxy_circular.pdf

Secretariat's assessment on Expectation 6	Expectation partially met
Secretariat comment	<p>Ivanhoe Mines published a statement of support for beneficial ownership transparency in the 2023 Sustainability Report. See URL p.21.</p> <p>The Secretariat notes the statement is not present in the 2024 edition of the sustainability report and recommends the company provide a link to this statement on their website or in the most recent editions of reporting to fully meet the Expectation.</p> <p>Ivanhoe Mines discloses beneficial owners in line with applicable regulations and listing requirements. The company is publicly listed on the Toronto Stock Exchange and additionally offers share on the OTCQX Best Market. See URLs.</p> <p>The company publishes information regarding their principal shareholders in the 2024 Management Proxy Circular. See URL pg. 12.</p>
EXPECTATION 7 Due diligence processes and anti-corruption policies	<p><i>All EITI supporting companies are expected to engage in rigorous due diligence processes and publish an anti-corruption policy setting out how the company manages corruption risk, including how the company collects and takes risk-based steps to use beneficial ownership data regarding joint venture partners, contractors, and suppliers in its processes.</i></p>
Does the company publish an anti-corruption policy?	Yes
URL to the policy	<p>Anti-Bribery and Anti-Corruption Policy: https://www.ivanhoemines.com/wp-content/uploads/2024-10-29-Ivanhoe-Mines-ABAC-Policy-Rev-A_v6b_FINAL_Photo.pdf</p> <p>Code of Business Conduct and Ethics: https://www.ivanhoemines.com/wp-content/uploads/Code-of-Business-Conduct-and-Ethics-2017Aug08_IR_Updated-2020-03-VF.pdf</p>
Does the company's anti-corruption policy describe how the company manages corruption risk with regards to identification and use of	Partial

beneficial ownership data?	
Secretariat's assessment on Expectation 7	Expectation partially met
Secretariat comment	<p>Ivanhoe Mines publishes an anti-corruption policy. See URLs.</p> <p>Ivanhoe Mines' anti-corruption policy partially sets out how the company manages corruption risk through the identification and use of beneficial ownership data.</p> <p>The anti-corruption and anti-bribery policy applies to all persons involved in an employment-type relationship with the Company as well as consultants, advisors, agents, and other third parties. The policy includes provisions on dealing with third party representatives. This includes steps the company takes to mitigate corruption risk this includes undertaking due diligence. The policy details core types of bribery and corruption including benefits, facilitation payments and kickbacks. The policy includes specific provisions for payments to public officials and gifts and entertainment. The company does not further describe its due diligence process including whether it mandates the collection or use of beneficial ownership data.</p> <p>The Secretariat encourages the company to strengthen its anti-corruption policy by clarifying how it collects and uses beneficial ownership data in its management of corruption risks to achieve fully met in this Expectation.</p>
EXPECTATION 8 Contract transparency	<i>Publicly declare and publish support for governments' efforts to publicly disclose contracts and licenses that govern the exploration and exploitation of oil, gas and minerals in line with the EITI Standard, and contribute to public disclosure of contracts and licenses in EITI implementing countries consistent with government procedures.</i>
Does the company publish a statement of support for contract transparency?	No
URL for statement of support for contract transparency	N/A
Does the company contribute to public	Yes

disclosure of contracts and licenses in EITI-implementing countries consistent with government procedures?	
Secretariat's assessment on Expectation 8	Expectation partially met
Secretariat comment	<p>Ivanhoe Mines does not publish a statement of support for governments' efforts to publicly disclose contracts and licenses.</p> <p>To make further progress on Expectation 8, please publish a statement of support for governments' efforts to publicly disclose contracts and licenses that govern the exploration and exploitation of oil, gas and minerals in line with the EITI Standard.</p> <p>The company has been assessed as contributing to contract and license disclosures in EITI implementing countries.</p> <p>The company is encouraged to publish the MoU with Zambia Minerals Investment Corporation.</p>
EXPECTATION 9 <i>Gender Diversity</i>	<i>Publish a commitment and/or policy on gender diversity in the oil, gas or mining sectors and support reporting by EITI implementing countries under the EITI Standard by disclosing employment in the sectors disaggregated by gender.</i>
Does the company publish a commitment/policy on gender diversity?	Yes
URL for commitment/policy on gender diversity	<p>2024 Sustainability Report: https://www.ivanhoemines.com/wp-content/uploads/2024_Sustainability_Report.pdf</p> <p>Executive Management Diversity Policy: https://www.ivanhoemines.com/wp-content/uploads/board_executive_management_diversity_policy.pdf</p>
Does the company disclose employment data disaggregated by gender?	Yes

<p>URL for gender disaggregated employment data</p>	<p>2024 sustainability report: https://www.ivanhoemines.com/wp-content/uploads/2024_Sustainability_Report.pdf</p>
<p>Secretariat's assessment on Expectation 9</p>	<p>Expectation met</p>
<p>Secretariat comment</p>	<p>Ivanhoe Mines publishes a policy and/or commitment on gender diversity. See URLs. 2024 Sustainability Report p. 44.</p> <p>The company publishes employment data disaggregated by gender. See URL pg. 44 - 46. Employment data is further disaggregated by occupational level, local employees and turnover by gender.</p>