

# **Hecla Mining Company**

## **Whistleblower Policy**

(Treatment of Complaints Regarding Financial Fraud and Accounting and Auditing Matters)

### **Purpose**

The purpose of this policy is to set forth the procedures established by the Audit Committee of the Hecla Mining Company Board of Directors for:

- (1) the receipt, retention and treatment of complaints or concerns received by Hecla Mining Company and its subsidiaries (collectively, “Hecla”) regarding financial fraud or accounting, internal accounting controls or auditing matters; and
- (2) the confidential, anonymous submission by Hecla’s employees or suppliers, contractors, shareholders, customers or other stakeholders of Hecla (collectively, “Stakeholders”) of complaints or concerns regarding financial fraud or questionable accounting or auditing matters.

### **Complaints and Concerns Covered by Policy**

The procedures set forth in this policy relate to complaints and concerns regarding:

- (1) financial fraud or questionable accounting, internal accounting controls or auditing matters, including, without limitation:
  - (a) fraud or deliberate error in the preparation, evaluation, review or audit of any Hecla financial statement;
  - (b) fraud or deliberate error in the recording and maintaining of Hecla’s financial records;
  - (c) deficiencies in or noncompliance with Hecla’s internal accounting controls;
  - (d) misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in Hecla’s financial records, financial reports or audit reports; or
  - (e) deviation from the full and fair reporting of Hecla’s financial condition; or
- (2) retaliation against employees or contractors who, in good faith, make reports regarding any of the foregoing items.

Any of the above complaints or concerns are considered a “Report” under this policy.

## **Responsibilities with Respect to Specified Reports**

The Audit Committee is responsible for overseeing the receipt, retention and investigation of and response to all Reports, including if made by Stakeholders. Hecla's General Counsel is responsible for administering these procedures on behalf of Hecla.

The General Counsel will promptly forward to the Audit Committee any Report involving a Hecla senior officer or having a potential aggregate value exceeding \$10,000. In determining whether the Audit Committee or the General Counsel should be responsible for investigating such Report, the Audit Committee will consider all relevant facts and circumstances, including the identity of the alleged wrongdoer, the gravity of the alleged wrongdoing and the likelihood of a material adverse effect on Hecla's reputation or financial statements.

The General Counsel (or his or her respective designee) will investigate all other Reports. At the next scheduled Audit Committee meeting, the General Counsel will present a summary of all other Reports received. The General Counsel will provide such additional information regarding any Report as may be requested by the Audit Committee.

## **Treatment of Reports**

In connection with the investigation of a Report, the Audit Committee and the General Counsel may consult with, and obtain the assistance of, any member of Hecla management who is not the subject of the Report. Additionally, independent legal, accounting or other advisors may be retained as necessary or appropriate.

Upon completion of the investigation of a Report, the General Counsel (or his or her respective designee) will update the Audit Committee of the outcome and prompt and appropriate corrective action shall be taken if the Report is substantiated.

Hecla may, in its reasonable discretion, determine not to commence an investigation if a Report contains only unspecified or broad allegations of wrongdoing without appropriate information support.

## **Follow-Up to Reports**

The Audit Committee or General Counsel will update, to the extent appropriate and practicable, each person who files a Report to inform him or her of the status of the investigation.

## **Retaliation Prohibited**

Consistent with Hecla's policies, neither Hecla, the Audit Committee nor any director, officer or employee of Hecla will retaliate, directly or indirectly, against any Hecla employee or Stakeholder who makes a Report in good faith or otherwise assists Hecla or any other person or group investigating a Report, including any governmental, regulatory or law enforcement body.

Neither Hecla, the Audit Committee nor any director, officer or employee of Hecla will  
(i) reveal the identity of any person who makes a Report and asks that his or her identity remain

confidential, unless compelled by judicial or other legal process, or (ii) make any effort to ascertain the identity of any person who makes a Report anonymously.

## **Records**

The General Counsel (or his or her respective designee) will maintain a log of all Reports, tracking their receipt, investigation and resolution and the response to the person making the Report.

Hecla will retain all Reports and all records relating to such Reports in accordance with the applicable provisions of any applicable records retention policy.

## **Procedures for Making Reports**

Reports can be made confidentially and anonymously, 24 hours a day, seven days a week as follows:

- (1) by writing to Hecla management at the following address:

Hecla Mining Company  
Attn: General Counsel  
6500 N. Mineral Drive, Suite 200  
Coeur d'Alene, Idaho 83815-9408

- (2) by calling the ConfidenceLine:

U.S. and Canada: 1-800-661-9675  
Mexico: 1-800-062-2572

- (3) by submitting an online report via the Hecla's ConfidenceLine portal located at: [www.hecla.confidenceline.net](http://www.hecla.confidenceline.net)

Hecla's ConfidenceLine is managed by an outside, independent service provider. The Hecla ConfidenceLine service provider is required to share promptly the information provided in the Report with the General Counsel or his or her respective designee. The Hecla ConfidenceLine service provider supplies instructions to individuals making a Report on how to follow-up and check on the status of a Report.

*Amended February 10, 2022*