SOCIAL SUSTAINABILITY POLICY

PURPOSE

Pan American Silver Corp. ("Pan American Silver") is committed to fostering positive and effective long-term relationships with communities of interest, with trust as a core value. We pursue this objective through transparent communication and ethical and sustainable business practices during exploration, design, construction, operation, closure, and post-closure of our mines, creating a positive legacy.

This Policy reflects our goal of creating value through sustainable and responsible mining.

COMMITMENTS

Pan American Silver commits to:

1. Abide by applicable laws and regulations in the countries and regions in which we operate. In some cases, we have also implemented policies and practices to reflect widely-recognized international standards for responsible business conduct that may impose higher standards than those legally required in our host countries.

2. Respect and support internationally recognized human rights laws and standards by seeking to avoid causing or contributing to adverse human rights impacts through our activities, addressing such impacts if they occur, and engaging in processes to mitigate those impacts.

3. Engage communities of interest through informed, participatory processes to build meaningful and ongoing relationships that promote mutual understanding and trust.

4. Identify and evaluate social risks and impacts, in dialogue with communities of interest with the goal of avoiding, minimizing and/or mitigating risks and impacts.

5. Promote an inclusive environment through our programs to respect and protect individuals and groups in vulnerable situations that may be disproportionately affected by the actual or potential impacts of our activities.

6. Recognize and respect the rights, cultural values, beliefs, knowledge, and traditions of Indigenous Peoples present in the areas where we operate, and aiming to achieve free, prior, and informed consent for impacts on rights of directly affected Indigenous Peoples.

7. Engage with communities of interest to identify, prioritize, and deliver community development initiatives aligned with local, national, and international priorities that support community health and education and contribute to sustainable development.

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1 “Communities of interest” means all individuals and groups who have an interest in, or believe they may be affected by, decisions respecting the management of our operations. They include but are not restricted to employees, Aboriginal or Indigenous peoples, mining community members, suppliers, neighbours, customers, contractors, environmental and other non-governmental organizations, governments, the financial community, and shareholders.
8. Promote local business development and employment opportunities related to our operations, provide capacity building support to optimize benefits to communities of interest, and promote value chain opportunities to sustainably develop local communities.

9. Avoid displacement or resettlement of individuals or communities when reasonably possible. Where required, mitigate adverse effects, and restore or improve livelihoods and standards of living of displaced people, in dialogue with those affected, in accordance with applicable laws and international standards.

10. Identify cultural heritage sites and engage with communities of interest to avoid, minimize, mitigate, and/or remedy adverse impacts from our activities.

11. Advance water stewardship by engaging with communities of interest to understand water use and needs in the catchments where we operate, particularly in areas of water scarcity, and collaborate to support access to clean, reliable water supplies for communities.

12. Develop mine closure plans through engagement with communities of interest to mitigate negative socio-economic impacts and support local and regional priorities for long-term socio-economic development.

13. Receive and seek to resolve incidents, concerns, and grievances from communities of interest, by providing timely responses through an effective and accessible response mechanism.

14. Establish operational social indicators and meaningful targets that support Pan American’s sustainability commitments, prioritize sustainable development goals, consider social aspects of climate change, and align with industry best practices.

15. Publicly report on social performance annually and in alignment with leading international standards and frameworks.

16. Regularly review this policy, pursuing continuous improvement in our social management systems and providing regular training to designated personnel.

RELATED POLICIES

Pan American Silver has additional policies that further the Company's social performance objectives. These include:

- Global Code of Ethical Conduct
- Global Anti-corruption Policy
- Global Human Rights Policy
- Supplier Code of Conduct
- Environmental Policy
- Health and Safety Policy
- Inclusion and Diversity Policy
- Board and Senior Management Diversity Policy
APPLICATION

This Social Performance Policy establishes commitments that must be followed by all directors, officers, employees, contractors, and business partners acting on behalf of or representing Pan American Silver.

The Senior Vice President, Corporate Affairs and Sustainability, is responsible for establishing and maintaining this Policy. The Policy is approved by the Board of Directors of Pan American Silver.