



## DISCLOSURE POLICY (NOVEMBER 2021)

### I. Purpose

SSR Mining Inc. (the “**Company**”) has established this Disclosure Policy (this “**Policy**”) to ensure compliance with the legal and regulatory requirements applicable to the disclosure of Material Information (as such term is defined in [Appendix A](#)) about the Company’s business to the investment community. The Company’s policy is to disclose Material Information about the Company publicly and not selectively in compliance with applicable law, including Regulation FD.

This Policy outlines the required process for the timely disclosure of all Material Information relating to the Company’s business, and provides guidance and assistance to the Company’s directors, officers and employees in complying with disclosure obligations under applicable securities laws and stock exchange rules.

### II. Application

This Policy applies to all Company directors, officers and employees, including those authorized to speak on behalf of the Company. In this Policy, these individuals are sometimes referred to as “**you**” or “**your**.” Reference to the Company in this Policy includes its subsidiaries, affiliates and joint ventures, wherever located.

This Policy applies to all disclosures contained in all documents filed with or furnished to the Company’s securities regulators or stock exchanges. In addition, this Policy also applies to any and all other statements communicated orally, verbally, in writing or electronically to any person, including, but not limited to, analysts, investors and the public, including press releases, postings on the Company’s website and on social media platforms, such as Twitter, blogs or chat rooms.

### III. Administration; Disclosure Committee

The Disclosure Committee has responsibility for the administration and interpretation of this Policy and ensuring compliance with it. In general, the Disclosure Committee shall design and implement disclosure controls and procedures, to provide reasonable assurance that material public disclosures are timely, accurate, complete, balanced and equally accessible, widely disseminated and that information required to be disclosed is prepared and reviewed by appropriate employees of the Company and timely reported. The Disclosure Committee shall also serve as the primary contact for any director, officer or employee of the Company wishing to discuss any question relating to the disclosure of information concerning the Company. The Disclosure Committee may adopt disclosure controls and procedures in addition to those set out in this Policy from time to time.

The Disclosure Committee is currently composed of the President and Chief Executive Officer, Chief Financial Officer and the Chief Legal & Administrative Officer, and others as designated by the Chief Executive Officer from time to time. The members of the Disclosure Committee may delegate certain of their duties and responsibilities set forth in this Policy to other proper officers of the Company or to certain proper employees of the Company.

The Disclosure Committee will be assisted in the performance of its duties by appropriate Company personnel. These personnel will assist in the review of disclosure materials upon request within their particular areas of operation, expertise or competence, as the case may be, and will be available for such other support functions as the Disclosure Committee may determine are necessary or appropriate in the fulfillment of their duties.

It is essential that the Disclosure Committee is sufficiently apprised of potentially material Company developments so they can discuss and evaluate any events that might impact the disclosure process. See Appendix A for examples of potentially Material Information.

If you have any questions about this Policy, you may obtain additional guidance from a member of the Disclosure Committee.

#### **IV. Designated Spokespersons**

The Company designates a limited number of spokespersons responsible for communicating with investors, analysts, portfolio managers, media and other persons (each a “**Designated Spokesperson**”). The President and Chief Executive Officer shall be the primary Designated Spokesperson of the Company. The members of the Company’s Executive Committee and the Company’s Investor Relations employees shall be secondary Designated Spokespersons. The Chief Executive Officer or Disclosure Committee may approve additional spokespersons and may designate other individuals to speak to matters within any such individual’s area of responsibility from time to time.

In addition, the Company’s Board of Directors is authorized to discuss public information or policy positions previously disclosed by the Company if approached by an analyst, investor or other member of the public after having consulted with a member of the Disclosure Committee or a Designated Spokesperson. Members of the Board of Directors must refer any inquiries from the media to a Designated Spokesperson.

When a Designated Spokesperson or a member of the Board of Directors meets with analysts, investors, portfolio managers, the media or others on an individual or small group basis, a member of the Investor Relations team must attend such meetings. When a member of the Investor Relations team is unable to attend such meetings, prior to such meetings, Investor Relations should brief those participating on the Company’s public disclosure to help ensure consistency in messages and disclosure. Where practical, statements and responses to anticipated major/top-level questions should be scripted or discussed in advance. The purpose of the Investor Relations team’s attendance at such meetings and/or the pre-briefing is to ensure that there is no disclosure of non-public Material Information, that all statements made are accurate and to allow follow-up cross-briefing to other Designated Spokespeople to ensure that communication is consistent.

The Designated Spokesperson or the member of the Investor Relations team who participates in any analyst or investor meeting, conference or other non-public event will normally hold a debriefing meeting as soon as practicable after any such meeting, conference or event with members of the Disclosure Committee. If such debriefing uncovers the disclosure of previously undisclosed Material

Information or the material inaccuracy of a statement made during the meeting, the Disclosure Committee will determine the appropriate courses of action.

If you are not a Designated Spokesperson, member of the Board of Directors, or have not been informed in writing that you have been specifically authorized to speak on a matter by the Disclosure Committee, you are not permitted to speak on behalf of the Company with analysts, investors or the media and must refer any inquiries to a Designated Spokespersons.

## **V. Timely Disclosure of Material Information**

Material Information about the Company must be disclosed in a timely, consistent and appropriate manner, in accordance with applicable laws and regulations. The Disclosure Committee is responsible for considering the materiality of information and events as they arise and determining the applicable disclosure obligations. If you have become aware of Material Information, you must immediately advise a member of the Disclosure Committee. You must also inform the Disclosure Committee if you become aware of any error in Material Information previously disclosed as it may require correction.

## **VI. Contact with Analysts, Investors and Media**

The Company recognizes that meetings with analysts, investors and the media are an important element of the Company's investor relations program, and that Designated Spokespersons may meet with analysts, investors and the media from time to time on an individual or small group basis. During any such meetings, Designated Spokespersons should never disclose non-public Material Information. Designated Spokespersons should only provide non-material information or Material Information that has already been publicly disclosed.

## **VII. Press Releases**

The Disclosure Committee must review all press releases for accuracy and completeness prior to dissemination, and the Legal Department and Investor Relations Department will coordinate the issuance of all press releases, including considering whether the subject matter of the press release triggers a filing with a securities or other regulatory body and whether the press release triggers notification to the stock exchanges on which the Company's securities are listed. In addition, all press releases issued in respect of quarterly and annual financial results must be reviewed and approved in accordance with the procedures set out by the Board of Directors and necessary filings with securities regulatory bodies must be made.

## **VIII. Conference Calls and Webcasts**

The Company periodically hold conference calls or webcasts to discuss quarterly or annual financial and operating results or major corporate developments. The Company will provide advance notice of such events by press release or other method of communication, which will include details regarding the date and time of any conference call or webcast, as well as participation details. If, during the conference calls or webcasts, selective disclosure of non-public Material Information has occurred, the Company will promptly disclose such information in accordance with applicable law and regulatory requirements.

## **IX. Electronic Communications; Social Media; Website**

Online communications are an extension of the Company's formal corporate disclosure record, and as such, the securities laws and rules of the stock exchanges applying to disclosure of information

apply equally to information posted on the Company's website and distributed by other electronic means, including through social media. Any disclosure through the website or social media accounts must comply with this Policy and all applicable securities laws and the rules of our stock exchanges.

Directors, officers and employees are not permitted to represent or speak on behalf of the Company on internet discussion forums, chat rooms, blogs or social networking services unless you are authorized to do so by the Disclosure Committee. While directors, officers and employees may repost previously released news releases on their personal social media accounts, these posts should be free from any additional commentary or discussion, including in the comments.

## **X. External Speeches and Presentations**

Acceptance of any invitations to give external speeches or presentations about the Company at conferences or other public venues at which shareholders, potential investors or media may be present, or which are expected to become available to any of the foregoing, must be pre-approved, and the content of any such speeches and presentations reviewed by the Disclosure Committee. In no event shall any such speeches and presentations contain Material Information that has not previously been publicly disclosed and must otherwise comply with this Policy.

## **XI. Rumours**

As a general rule, The Company will not comment, positively or negatively, on rumours or speculation. about the Company. If a stock exchange or a securities regulatory authority requests that the Company make a statement in response to a market rumour, the Disclosure Committee will consider the matter and prepare an appropriate response, having consulted with legal counsel if deemed necessary.

## **XII. Maintaining Confidentiality**

Any officer, director or employee privy to confidential information (regardless of whether such information is also Material Information), should maintain such information in confidence and should not disclose such information to anyone other than authorized Company personnel or representatives who have a legitimate need to know such information in connection with their duties and who have been advised of the confidential nature of such information. Confidential information should not be disclose to any outside party except to the extent that it is necessary to do so in the ordinary course of business.

In order to prevent the misuse or inadvertent disclosure of confidential information, reasonable steps to safeguard confidential information should be taken, including the following:

- Keep documents containing confidential information in a safe place with access restricted to individuals who "need to know" that information in the necessary course of business and use code names if necessary.
- Use passwords to protect access to confidential electronic data.
- Do not discuss confidential matters in places where or in a manner in which the discussion may be overheard.
- Do not read confidential documents in public places or leave such documents where others may retrieve them.

- Avoid unnecessary copying of confidential documents. Extra copies of confidential documents should be shredded or otherwise destroyed.
- Transmit confidential documents by electronic means only where it is reasonable to believe that such transmission can be made and received securely.

### **XIII. Avoiding Selective Disclosure**

When participating in shareholder meetings, news conferences, speaking with the media, analysts' conferences and private meetings with shareholders, potential investors or analysts, Designated Spokespersons must only discuss non-material information or Material Information that has been previously publicly disclosed. Designated Spokespersons may never make "selective" disclosure of non-public Material Information, including disclosing smaller, non-material components of Material Information. If you have a concern that any disclosure of non-public Material Information or "selective disclosure" to an outside party has occurred in a meeting, conference or otherwise, other than in accordance with this Policy, you must immediately contact a member of the Disclosure Committee.

### **XIV. Inadvertent Disclosure**

In the event that non-public Material Information is inadvertently disclosed prior to broad public dissemination, the Company will be required to make an immediate announcement on the matter, as required by applicable securities laws and rules of security exchanges. In certain cases, the Company must also inform the parties that received the Material Information that the information is non-public Material Information that must be kept confidential, and the Company must advise them of their legal obligations with respect to the Material Information, including that they cannot trade in the Company's securities until the non-public Material Information has been generally disclosed.

### **XV. Forward-Looking Information**

The Company may from time to time provide certain forward-looking information in news releases and other disclosure materials to enable shareholders and potential investors to evaluate the Company. Forward-looking information may include statements about future or anticipated growth, operating results and performance of the Company and its business prospects and opportunities. Any such information will be clearly identified as forward-looking, accompanied by appropriate cautionary language and made in compliance with applicable securities laws. All new public disclosures of material forward-looking information must be approved by the Disclosure Committee.

### **XVI. Analyst Reports**

Only Designated Spokespersons may provide comments on analysts' reports. Such comments must be limited to an identification of factual information that has been previously disclosed that may affect an analyst's model or estimates and inaccuracies or omissions with respect to information that has been generally disclosed. A Designated Spokesperson may discuss economic and industry trends, which are generally known or that may affect the Company. The Company will not directly or indirectly express or indicate "comfort" or concurrence with respect to analyst draft reports and models or the assumptions underlying the report.

Any comments on analysts' reports must contain a disclaimer that the report was only reviewed for factual accuracy with respect to the Company. Designated Spokespersons cannot confirm or endorse an analyst's models or estimates and must not attempt to influence an analyst's opinion or conclusion.

Analysts' reports must not be disseminated except that the Designated Spokespersons may distribute the reports to the Board of Directors and employees of the Company to the extent necessary in the course of their duties. Such reports should not be distributed to anyone outside of the Company.

**XVII. Reporting and Enforcement**

Violations or suspected violations of this Policy should be reported in accordance with the procedures under the *Whistleblower Policy*.

Failure to observe this Policy may result in disciplinary action up to and including termination. Furthermore, violations of this Policy may also be violations of applicable laws and may result in penalties for you and/or the Company.

**XVIII. Certification**

Upon commencement of employment or association with the Company begins, you must sign an acknowledgement form confirming that you have read and understand this Policy and agree to comply with it. Requests to make similar acknowledgements may be made on an annual basis.

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## **Appendix A**

### **Definition of Material Information**

#### *Definition of Material Information*

Material Information is any information, event or circumstance (including a change in previous information or facts) relating to the business and affairs of the Company that would have a reasonable likelihood to have a significant effect on the market price of the Company's securities, be considered, by a reasonable investor, important to an investor in making an investment decision regarding the purchase or sale of the Company's securities or significantly altering the total mix of information available. The determination of whether information is "material" is subjective and requires judgement.

Examples of potentially material items include:

- Financial results, including unexpected changes (increases or decreases);
- Projections of future earnings, losses, or capital budgets;
- News of pending or proposed mergers, acquisitions, divestitures or joint ventures;
- Increase, decreases or reclassifications of mineral reserves and/or mineral resources;
- Exploration results or changes in mining plans;
- Impending bankruptcy or financial liquidity problems;
- Changes in dividend or distribution policy;
- Material modifications to rights of securityholders;
- Share repurchases;
- Work stoppages or other events affecting production, construction or exploration;
- Significant market or contractual arrangements that may affect costs or expenses;
- Splits, reverse splits or other changes in the Company's capital structure;
- Proposed or new equity or debt financings;
- Changes in the Company's capital investment plans or corporate objectives;
- Litigation exposure due to actual or threatened litigation;
- Regulatory or legislative changes affecting the Company;
- Changes in prior public statements;
- Changes in independent auditors;
- Changes in senior management; and
- Events or actions of others that affect the Company's business or outlook.

**The list set forth above is provided for informational purposes only and is not intended to be exhaustive.**