

## **HECLA MINING COMPANY**

### **WHISTLEBLOWER POLICY**

#### **Purpose**

Hecla Mining Company (the “Company”) has adopted this policy to encourage its employees to report to appropriate representatives of the Company, without fear of retaliation, certain accounting information relating to fraud. Any employee of the Company may submit, on a confidential and anonymous basis if the employee so desires, any concerns regarding financial statement disclosures, accounting, internal accounting controls or auditing matters. The goal of this policy is to discourage illegal activity and business conduct that damages the Company’s good name, business interests, and its relationship with shareholders and residents of the community, and if it exists, to find and correct the problem.

The Company’s internal operating controls and corporate reporting and disclosure procedures are intended to assure compliance with applicable laws and regulations that relate to corporate reporting and disclosure, accounting and auditing controls and procedures. However, the Company has a responsibility to investigate and report to appropriate governmental authorities, as required, any violations of applicable legal and regulatory requirements relating to corporate reporting and disclosure, accounting and auditing controls and procedures, and the actions taken by the Company to remedy such violations. Every employee of the Company has the responsibility to assist the Company in meeting these legal and regulatory requirements.

This policy governs the process through which employees and others, acting on behalf of the Company, either directly or anonymously can notify the appropriate representatives of the Company and/or the Audit Committee of the Company’s Board of Directors of potential violations or concerns. In this regard you should know that the Audit Committee is totally independent of Company management. In addition, this policy establishes a mechanism for responding to, and keeping records of, any complaints from employees and others regarding such potential violations or concerns.

This policy applies only to accounting related matters and does not apply to all grievances that an employee may have such as those related to terms of employment or those concerns that are addressed by other policies of the Company such as sexual harassment or the Company’s Code of Business Conduct and Ethics. Please read any other policies for their reporting procedures.

## **Scope of Matters Covered by this Policy**

This policy relates to employee complaints relating to any questionable accounting or auditing matters, including:

- fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of the Company;
- fraud or deliberate error in the recording and maintaining of financial records of the Company;
- deficiencies in or noncompliance with the Company's internal accounting controls;
- misrepresentations or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports or audit reports of the Company; or
- deviation from full and fair reporting of the Company's financial condition.

## **Confidentiality of Complaints**

The Company will treat all complaints by employees as confidential. The Company will keep confidential the identity of any employee making a complaint under this policy until a formal investigation is commenced. Thereafter the identity of the employee making the complaint may be kept confidential, if requested, unless such confidentiality is incompatible with a fair investigation, or unless there is an overriding reason for identifying or otherwise disclosing the identity of the employee making the complaint, or unless disclosure of the identity of the employee is required by law. Where disciplinary proceedings are invoked against any individual as a result of a complaint under this policy, the Company will normally require that the name of the person making the complaint be disclosed to the person subject to such proceedings. The Company encourages employees to put their name to any complaint they make but any employee may also make an anonymous complaint pursuant to the procedures set forth below. In responding to an anonymous complaint, the Company will pay due regard to fairness to any individual named in the complaint, the seriousness of the issue raised, the credibility of the information or allegations in the complaint, and the prospect of an effective investigation. Investigations will be conducted as quickly as possible, taking into account the nature and complexity of the complaint and the issues raised.

## **Complaint Procedures**

Any employee of the Company may submit a good faith complaint regarding accounting or auditing matters to the management of the Company without fear of dismissal or retaliation of any kind. The Company is committed to achieving compliance with all applicable securities laws and regulations, accounting standards, accounting controls and audit practices. The Company's Audit Committee will oversee treatment of employee concerns in this area.

In order to facilitate the reporting of employee complaints, the Company's Audit Committee has established the following procedures for (1) the receipt, retention and treatment of complaints regarding accounting, internal accounting controls, or auditing matters ("Accounting Matters") and (2) the confidential, anonymous submission by employees of concerns regarding questionable accounting or auditing matters.

### Receipt of Complaints

Any complaint by an employee to the Company under this policy may be made by using any of these three methods:

1. Employees with concerns regarding Accounting Matters may report their concerns or complaints in writing directly to:

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

The General Counsel shall forward a copy of the same to the Chairman of the Audit Committee.

Or

2. Employees may report complaints or concerns regarding Accounting Matters on a confidential, anonymous basis to the Audit Committee through regular mail marked CONFIDENTIAL and addressed as follows:

Chairman of Audit Committee  
Hecla Mining Company  
6500 N. Mineral Drive, Suite 200  
Coeur d'Alene, Idaho 83815-9408

Or

3. Employees may also contact ConfidenceLine, our third-party agent. There are two methods of reporting through ConfidenceLine. You can speak to a ConfidenceLine agent by calling the numbers listed below and a qualified agent will be available to record and report your concerns 365 days per year, 24 hours a day. Alternatively, you can go on-line yourself at the web address listed below. The secure web application will ask you general questions about your concern.

U.S. & Canada: 1-800-661-9675

Mexico: 01 800 062 2572

Web: [www.hecla.confidenceline.net](http://www.hecla.confidenceline.net)

Employees using these anonymous hotlines or web application will have their report forwarded to the Chairman of the Audit Committee and, unless they specify otherwise, to the General Counsel.

When submitting the complaint directly to the General Counsel or Chairman of the Audit Committee, please insure the complaint is in writing so as to assure a clear understanding of the issues raised. The complaint should be factual rather than speculative or conclusory, and should contain as much specific information as possible to allow for proper assessment. The complaint describing an alleged violation or concern should be candid and set forth all of the information that the employee knows regarding the allegation or concern. In addition, all complaints must contain sufficient corroborating information to support the commencement of an investigation. The Company may, in its reasonable discretion, determine not to commence an investigation if a complaint contains only unspecified or broad allegations of wrongdoing without appropriate information support.

#### Treatment of Complaints

Upon receipt of the complaint by the Chairman of the Audit Committee or the General Counsel, if designated by the Chairman (the "Investigating Officer"), the Investigating Officer shall make a determination, in his or her reasonable judgment, whether a reasonable basis exists for commencing an investigation into the complaint. To assist in making this determination, the Investigating Officer may conduct an initial, informal inquiry. At the request of the Investigating Officer, other parties may become involved in the inquiry based on their oversight responsibility or expertise.

To the extent possible, all complaints will be handled in a confidential manner. In no event will information concerning the complaint be released to persons without specific need to know about it. Investigation of complaints, to the extent possible, will be prompt. The determination by the Investigating

Officer will be communicated to the employee who brought the complaint, unless anonymous, to the Audit Committee and to relevant management, as appropriate.

Upon making a determination to recommend a formal investigation, the Investigating Officer will promptly notify the members of the Audit Committee or its member designee. The Audit Committee or its member designee will then determine, in its reasonable judgment, whether a reasonable basis exists for commencing a formal investigation into the complaint. If the Audit Committee or its member designee makes such a determination, then it shall instruct the Investigating Officer to proceed with a formal investigation. The Investigating Officer shall oversee all investigations under the authority of the Audit Committee. The Audit Committee shall ensure coordination of each investigation and shall have overall responsibility for implementation of this policy. The Audit Committee shall have the authority to retain outside legal or accounting expertise in any investigation, as it deems necessary to conduct the investigation in accordance with its charter and this policy.

At each meeting of the Audit Committee, the General Counsel shall prepare a report to the Audit Committee stating the nature of each complaint submitted during the quarter, if any, immediately preceding the meeting of the Audit Committee, whether or not the complaint resulted in the commencement of a formal investigation, and the status of each investigation and this shall be a standing item on the Committee agenda.

### **Corrective Action**

The Audit Committee, with the input of the Investigating Officer and Company management, if requested, will determine the validity of a complaint and any corrective action, as appropriate. It is the responsibility of the Audit Committee to report to the full Board and to Company management any noncompliance with legal and regulatory requirements and to assure that management takes corrective action including, where appropriate, reporting any violation to the relevant federal, state or regulatory authorities. Directors, officers and employees that are found to have knowingly violated any laws, governmental regulations or Company policies will face appropriate, case specific disciplinary action.

### **No Retaliation for Submitting Complaints, Providing Information or Participating In Investigations**

The Company will not discharge, demote, suspend, threaten, harass or in any manner discriminate against any employee in the terms and conditions of employment based upon any lawful actions of such employee with respect to good faith reporting of complaints regarding Accounting Matters.

Retaliation against any employee, who seeks advice, raises a concern, or reports misconduct is strictly prohibited. If an individual retaliates against an employee who has truthfully and in good faith reported a violation, the Company will take appropriate action, even if it later turns out that the employee was mistaken in reporting the matter originally. Appropriate action will also be taken against any individual who has intentionally made a false report. Any alleged retaliation for using this Whistleblower Policy should be reported to the Company's General Counsel immediately at (208) 209-1258 or at the address set forth above. Reports of retaliation may also be made to the Company's Audit Committee at the address set forth above. Complaints should be as detailed as possible, including the names of individuals involved, the names of any witnesses, and any documentary evidence. Any employee who believes that his or her rights against retaliation or discrimination have been violated may also file a complaint with the Department of Labor within 30 days of the alleged violation.

### **Retention of Complaints and Documents**

At the direction of the Audit Committee, the General Counsel will maintain a log of all complaints, tracking their receipt, investigation and resolution. All complaints submitted by an employee regarding an alleged violation or concern will remain confidential to the extent practicable. In addition, all written statements, along with the results of any investigations relating thereto, shall be retained by the Company for a minimum of three years.

May 2017