



MODERN SLAVERY STATEMENT

2023

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Letter from our CEO

At Fresnillo plc, our unwavering commitment ensures that no form of modern slavery—including, but not limited to forced labour, child labour, or human trafficking—exists within our value chain.

This past year continued to underscore the challenges and responsibilities inherent to the mining industry, as is our commitment to combat modern slavery across our operations in Mexico, and exploration projects in Peru, and Chile—aligned by our purpose to contribute to the well-being of people through the sustainable mining of silver and gold.

In 2023, we remained vigilant of the threat of modern slavery that affects an estimated 50 million people worldwide, including around 850,000 people in Mexico—which ranks 64th worldwide according to the Global Slavery Index, which constitutes a potential risk in our value chain. It is a reality that demands both our attention and concerted action.

Since endorsing the United Nations' Global Compact in 2009, our commitment to responsible business practices has been a cornerstone of how we operate, guiding what we do and how we do it, and centring on a profound dedication to collaborating with and creating value for our stakeholders.

The complexity of modern supply chains challenges us to uphold rigorous standards and accountability for our Environmental, Social, and Governance (ESG) performance across our operations, amplifying our efforts to instil these principles throughout our network of business partners. This year, we have further intensified our efforts, implementing compulsory training for our

workforce on key integrity and compliance issues that include the promotion of the respect of human and labour rights.

In addition, we provide workshops for our contractors on our Third Party Code of Conduct, highlighting human and labour rights. Collaboratively, we work across departments and with our supply chain to prevent, identify, mitigate, and remediate potential human and labour rights impacts, promoting best practices in human rights due diligence.

Through permanent campaigns that socialize our Code of Conduct and Third-Party Code of Conduct, we have also set the tone for our suppliers and contractors to join our efforts to enforce our zero-tolerance stance regarding modern slavery in all its forms.

To keep on strengthening our commitment to combat modern slavery, we will continue to focus on concrete actions, including specific assessments for modern slavery risks in our workforce and supply chain, and further alignment with best practices to address this matter.

This year's statement outlines our efforts to prevent modern slavery and human trafficking in our workforce and value chain, driven by our commitment to continuous improvement, fostering an environment of transparency and accountability.



Octavio Alvidrez
Chief Executive Officer, Fresnillo plc



Key highlights 2023

The products obtained from Fresnillo's industrial processes (precious metals) hold **responsible sourcing certification from the London Bullion Market Association (LBMA)**—based on the OECD Due Diligence Guidance—which enable us to demonstrate to clients and investors that the precious metals value chain is conflict-free.

538

people, including owners, legal representatives, and residents from our Third Parties received training regarding our Third-Party Code of Conduct.

4,732

new employees, union members and contractors participated in the Labour and Sexual Harassment Prevention workshop.

Workforce engagement sessions with the Designated Non-Executive Director in Fresnillo city to gain first-hand knowledge of the views of our workforce. These sessions brought together representatives from the Company's operations in the Fresnillo District.



Introduction

Fresnillo plc (“Fresnillo” or the “Company”) is the world’s leading primary silver producer and one of Mexico’s largest gold producers, listed on the London and Mexican stock exchanges. The Company was established in 2008 following a spin-off of the precious metal assets of Industrias Peñoles (one of Mexico’s major mining groups). Fresnillo’s main business operations are located in Mexico, having exploration projects in very early stages in Peru and Chile. In all of our business operations, our Company is committed to upholding human rights and does not tolerate any form of Modern Slavery, including forced labour and human trafficking. We are dedicated to ensuring that Modern Slavery practices are not present in our value chain. Inspired by our purpose to contribute to the wellbeing of people through the sustainable mining of silver and gold, we prioritise the promotion of best practices on human rights due diligence, which includes the identification, mitigation and remediation of any negative impacts in our workforce, including our employees and contractors. It guides everything we do, how we do it, and ensures that we create value for all our stakeholders, including our workforce, shareholders, local communities, suppliers, the authorities, and the environment.

At the core of Fresnillo’s commitment to being a responsible business and an employer of choice lies our profound dedication to our people. We have invested significant efforts in providing comprehensive assistance and unwavering support to our workforce and our communities, recognizing their unique needs, and striving to meet them with utmost care and diligence.

We collaborate closely with our partners in the value chain to prevent and address potential impacts on human rights. Through our contracts and third-party code of conduct we set the tone for our suppliers and contractors to join our efforts to reject Modern Slavery in all its forms. This year’s statement presents our efforts to prevent Modern Slavery and human trafficking in our workforce and value chain.



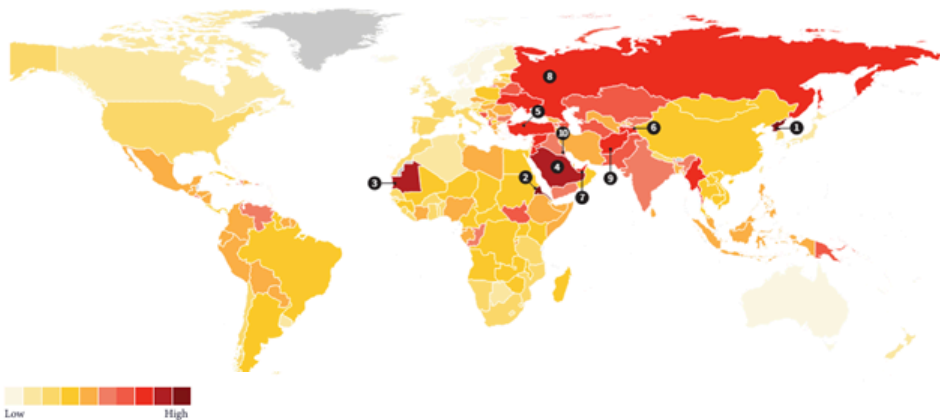
Modern Slavery CONTEXT

Our core operations are concentrated in Mexico; additionally, there are smaller-scale exploration projects in Peru and Chile. Hence, it is pertinent to give context to Modern Slavery, first at an international level starting with the applicable international instruments, and then expand in Mexico, as well as including a mention of the contexts of Peru and Chile.



International instruments

Forced labour, as set out in the International Labour Organisation (ILO) Forced Labour Convention, 1930 (No.29), refers to “all work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself or herself voluntarily”.¹ Forced labour does not depend on the type or sector of work, but only on whether the work was imposed on a person against their will through the use of coercion. Human Trafficking is “the recruitment, transportation, transfer, harbouring or receipt of people through force, fraud or deception, with the aim of exploiting them for profit”.² Women, children and men of all ages and backgrounds can become victims of this crime, which occurs in every region of the world.



Rank	Country	Prevalence
1	North Korea	104.6
2	Eritrea	90.3
3	Mauritania	32.0
4	Saudi Arabia	21.3
5	Türkiye	15.6
6	Tajikistan	14.0
7	United Arab Emirates	13.4
8	Russia	13.0
9	Afghanistan	13.0
10	Kuwait	13.0

Estimated prevalence of modern slavery by country³

Noting estimated prevalence per 1,000 population for the 10 countries with highest prevalence

1. ILO, Global Estimates of Modern Slavery, Forced Labour and Forced Marriage, September 2022.

2. United Nations Office on Drugs and Crime. Global report on trafficking in persons 2022.

3. Global Slavery Index, World Map, 2023. Available at: <https://www.walkfree.org/global-slavery-index/map/>

UK Modern Slavery Act 2015

The broader definition of Modern Slavery encompasses slavery, servitude and forced or compulsory labour, human trafficking, sexual exploitation, and child labour. According to Article 12 of Section 54 of the UK Modern Slavery Act of 2015, the definition applies to all conducts that constitute offence under section 1, 2 or 4 of the Act, which encompasses cases when:

- A person holds another person in slavery or servitude.
- A person requires another person to perform forced or compulsory labour.
- A person arranges or facilitates the travel of another person with a view of the person being exploited.
- A person aids, abets, advises, procures, or incites actions for another person to be exploited.

Modern Slavery context in Mexico

The mining operations that represent our core and major business are located in Mexico, reason why it is important to provide context of Modern Slavery in this country.

According to the 2023 Global Slavery Index in Mexico¹:

6.6 per 1,000 people

Prevalence of modern slavery

850,000

People living in forced labour or marriage in 2021

58/100

Vulnerability* to modern slavery

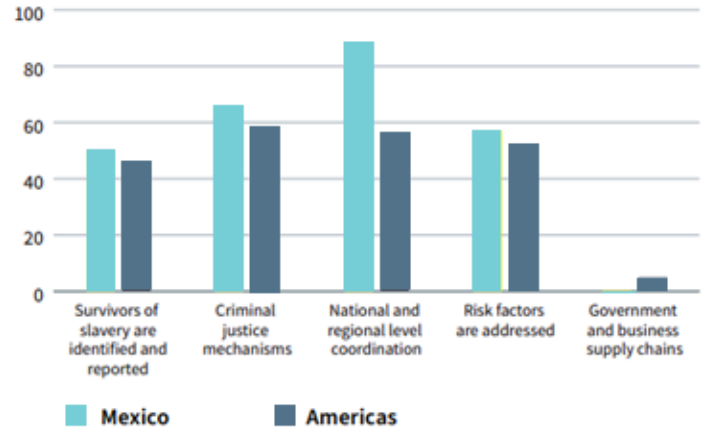
55/100

Government response to modern slavery

In terms of prevalence, Mexico ranks **64th** globally and **13th** within the Americas.

*How vulnerable a country's people are to modern slavery is dependent on a range of factors which reflect the strength of governance, access to basic needs, inequality, disenfranchised groups, and effects of conflict.

Mexico's government responses to modern slavery by milestone, compared with the regional average



Importing risk of modern slavery

Mexico imported US\$9.2 billion worth of goods at risk of modern slavery. This includes:



Electronics
US\$5.7 BILLION



Garments
US\$2.2 BILLION



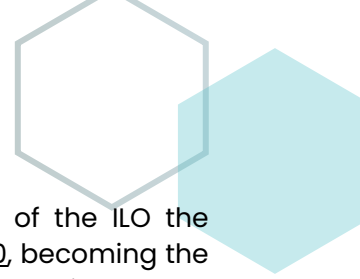
Solar panels
US\$500 MILLION



Textiles
US\$500 MILLION



Timber
US\$300 MILLION

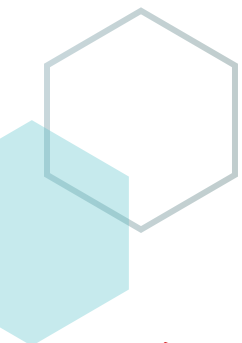


"On 11 June 2023, the Government of Mexico deposited with the Director-General of the ILO the instrument of ratification of the Protocol of 2014 to the Forced Labour Convention, 1930, becoming the 60th country in the world to ratify this important instrument, which strengthens the international legal framework to eliminate all forms of forced or compulsory labour, including human trafficking. According to the ILO, 27.6 million people are in forced labour, of which 17.3 million are exploited in the private sector; 6.3 million in forced commercial sexual exploitation, and 3.9 million in forced labour imposed by state. The Forced Labour Protocol requires ratifying states to take effective measures to prevent all forms of forced labour, to protect victims and ensure their access to effective remedies and compensation, and to apply appropriate sanctions against perpetrators of forced labour" (ILO, 2023).¹

This event has major relevance and generates a positive effect in Mexico, given that the international treaties adopted in Mexico have important provisions on Human Rights and automatically become applicable and binding domestic law in Mexico, according to the Mexica Constitution.

Another important international legal instrument applicable in Mexico, is the free trade agreement with Canada and the United States (USMCA) that includes a chapter for Labour matters, where the member countries shall prohibit the importation of goods into their territory from other sources produced in whole, or in part, by forced or compulsory labour.

"According to those international instruments, on February 17, 2023, the Mexican Minister of Labour and Social Welfare (STPS – Secretaría de Trabajo y Previsión Social) published a decree to restrict the importation of goods into Mexico produced in whole or in part under forced labour conditions (effective on May 18, 2023). In line with these regulations, the government has the authority to initiate proceedings to investigate labour standards in companies producing goods, and companies importing goods into Mexico should review the labour standards of their foreign suppliers to make sure there are no forced labour indicators" (Cordova, 2023).²



Legal Framework in Mexico:

- The Constitution (Constitución Política de los Estados Unidos Mexicanos) forbids forced labour and inhumane work conditions.
- The General Law to Prevent, Prosecute and Eradicate Human Trafficking Crimes and to Protect and Assist the Victims of these crimes (Ley General para Prevenir, Sancionar y Erradicar los Delitos en Materia de Trata de Personas y para la Protección y Asistencia a las Víctimas de estos Delitos), prohibits human trafficking in any of its forms and sets the framework to prosecute offenders and assist the victims.
- The Federal Labour Law (Ley Federal del Trabajo) regulates labour rights and working conditions, and the labour reform regarding outsourcing.

Relevant Government Agencies in Mexico:

- The Labour Ministry (Secretaría del Trabajo y Previsión Social).
- National Human Rights Commission (Comisión Nacional de los Derechos Humanos).
- National Institute of Migration (Instituto Nacional de Migración).
- Executive Commission for Attention to Victims (Comisión Ejecutiva de Atención a Víctimas).
- Special Prosecutor's Office for Violence against Women and Human Trafficking (Fiscalía Especializada para los Delitos de Violencia contra las Mujeres y Trata de Personas).
- Interinstitutional Commission against Human Trafficking (Comisión Intersecretarial Contra la Trata de Personas).

Modern slavery context in Chile and Peru

Besides our mining operations in Mexico, we have early-stage exploration projects in Peru and Chile. Therefore, we consider it important to provide context of modern slavery in these countries.

Country	Estimated prevalence of modern slavery (per 1,000 people)	Estimated number of people in modern slavery	Population
Peru	7.1	234,000	32,972,000
Chile	3.2	61,000	19,116,000

1. Walk Free 2023, Global Slavery Index 2023, Minderoo Foundation. Available at: <https://www.walkfree.org/global-slavery-index/>



Business STRUCTURE

Our business model spans the full mining value chain from exploration, development and construction, to mining operations. We generate revenue by selling the metals contained in the ore concentrate we extract and process, which contain mainly gold and silver; production of doré bars, as well as sub products, including lead and zinc.

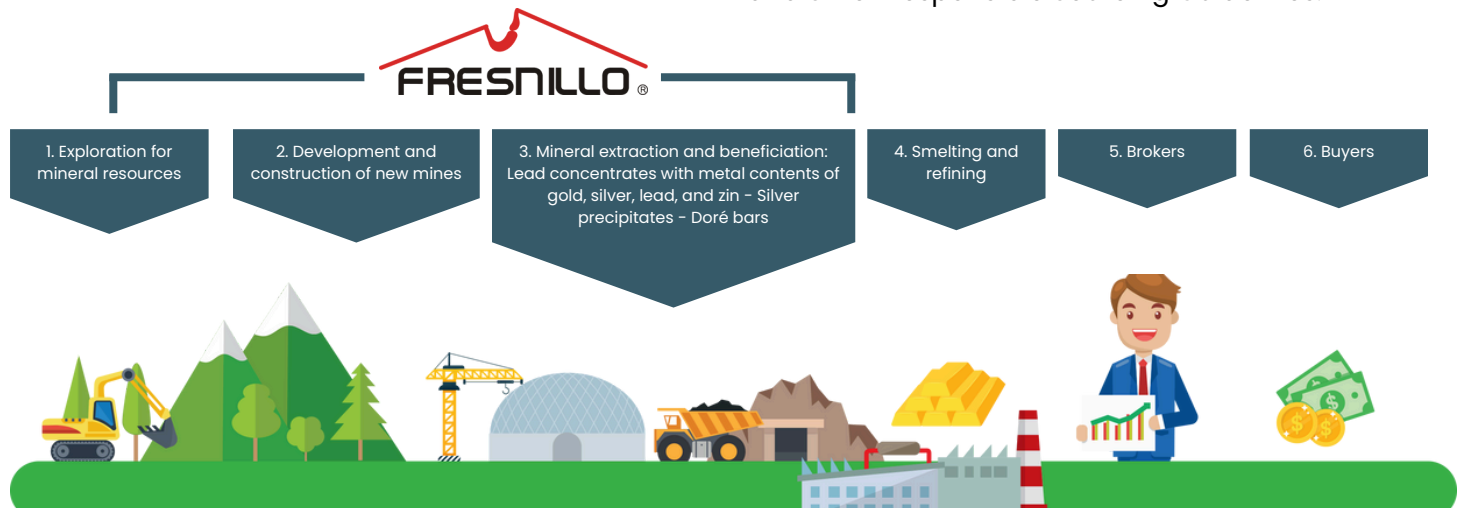
Based in Mexico, Fresnillo draws on the country's significant geological resources and strong potential for continued growth. We benefit from Mexico's skilled workforce and solid infrastructure, and we are proud to continue playing an important part in a rich mining tradition that stretches back more than 500 years. Our mining concessions extend to approximately 1.6 million hectares in Mexico, securing valuable employment for 19,776 people and contributing some US\$2,347.8¹ million to the country's economy each year.

Regarding the destination of our products, during 2023 Fresnillo sold 99.9% of the production to the metallurgical complex of Industrias Peñoles (who is also our Parent Company, owning 75% of Fresnillo's shares, and our main service provider), who

processes it (smelting and refining, please see stage 4 in diagram below) and introduces it into the market. In this context, it is important to highlight that the products obtained from Fresnillo's industrial processes (precious metals) and commercialised by Industrias Peñoles, hold responsible sourcing certification from the London Bullion Market Association (LBMA) –based on the OECD Due Diligence Guidance– which enable our Parent Company (Industrias Peñoles) to demonstrate to clients and investors that the precious metals value chain is conflict-free. This precious metals' value chain includes Fresnillo plc whose precious metal mines that supply raw materials to the metallurgical complex of our Parent Company (Industrias Peñoles) are audited together with Industrias Peñoles' shippers and refinery for this LBMA certification (this audit to Fresnillo is performed by a third party to avoid the risk of conflicts of interest).

The internal and external audits include interviews to understand the measures taken to protect the human rights of indigenous peoples, the management of impacts on communities and the environment, the management of ethics and integrity programs to combat money laundering and prevent terrorism financing, as well as other labour practice issues such as health, safety, and labour relations.

During 2023, our parent company Industrias Peñoles resumed visits to shippers to assess their sustainability practices and level of risk using our due diligence process—which is based on the Gold and Silver Responsible Sourcing Guidelines.





Organisation Structure

The Company has the following operating mines, that constitute its core business, all of them located in Mexico: Fresnillo, Saucito, Juanicipio, Ciénega, Herradura, Noche Buena (in process of progressive closure), San Julián and Soledad-Dipolos (operations currently suspended). The Group also has four advanced exploration projects underway: Orisyvo, Guanajuato, Rodeo and Tajitos. In addition, we have many further early-stage exploration projects and prospects located in Mexico, as well as a few others in Peru and Chile, which represent a minor part of our business.

The subsidiaries in which investments are directly held as at 31 December 2023 are as follows:

Legal company	Principal activity	Country of incorporation	Equity interest % Year ended 31 December 2023
Minera Fresnillo, S.A. de C.V.	Production of lead/silver and zinc concentrates	México ³	100
Minera San Julian, S.A. de C.V.	Production of lead/silver and zinc concentrates	México ³	100
Minera Penmont, S. de R.L. de C.V. ¹	Production of doré bars (gold/silver)	México ³	56
Minera Mexicana La Ciénega, S.A. de C.V.	Production of lead and zinc concentrates and silver precipitates	México ³	100
Minera Saucito, S.A. de C.V.	Production of lead and zinc concentrates	México ³	100
Equipos Mineros Nazas, S.A. de C.V.	Leasing of mining equipment	México ³	100
Provedora de Equipos Fresne, S de R.L. de C.V. ¹	Leasing of mining equipment	México ³	56
Equipos Mineros la Hacienda, S.A. de C.V.	Leasing of mining equipment	México ³	100
Provedora de Equipos Jerez, S.A. de C.V.	Leasing of mining equipment	México ³	100
Equipos Chaparral, S.A. de C.V.	Leasing of mining equipment	México ³	56
Minera Juanicipio, S.A. de C.V.	Production of lead/silver and zinc concentrates	México ³	56
Comercializadora de Metales Fresnillo, S.A. de C.V.	Holds rights over silver production from Peñoles' polymetallic Sabinas mine through the Silverstream contract	México ³	100
Exploraciones Mineras Parreña, S.A. de C.V.	Exploration services	México ³	100
Exploraciones y Desarrollos Mineros Coneto, S.A. P. I. de C.V.	Exploration services	México ³	55
Minera El Bermejil, S. de R.L. de C.V.	Mining equipment leasing	México ³	56
Compañía Minera Las Torres, S.A. de C.V.	Mine project	México ³	100
Servicios Administrativos Fresnillo, S. A. de C.V.	Administrative services	México ³	100
Operaciones Fresnillo, S.A. de C.V.	Administrative services	México ³	100
Servicios de Exploración Fresnillo, S.A. de C.V.	Administrative services	México ³	100
Prestadora de Servicios Jarillas, S.A. de C.V.	Administrative services	México ³	100
Fresnillo Management Services, Ltd	Administrative services	UK ⁴	100
Fresbal Investments, Ltd	Holding company for mining Investments	Canada ⁵	100
Fresnillo Perú, S.A.C.	Exploration services	Peru ⁶	100
Parreña Perú, S.A.C.	Exploration services	Peru ⁶	100
Fresnillo Chile, SpA	Exploration services	Chile ⁷	100
Minera Capricornio, SpA	Exploration services	Chile ⁷	100
Caja de Ahorros Fresnillo, S.C. ²	Administrative services	México ³	-

1. The remaining 44% interest in these companies are held by Comercializadora de Metales Fresnillo, S.A. de C.V. a wholly-owned subsidiary of the Company.

2. Whilst Fresnillo plc holds no direct ownership in Caja de Ahorros Fresnillo, S.C. the entire share capital of the company is held through its subsidiaries.

3. The registered address for all Mexican subsidiaries is: Calzada Saltillo 400 No. 989, Torreón, Coahuila 27250.

4. Registered address is: Second Floor, 21 Upper Brook Street, London W1.

5. Registered address is: 355 Burrard Street, Suite 1800, Vancouver, BC, V6C 2G8.

6. Registered address is: República de Colombia 643, Piso 9, Distrito San Isidro, Lima 27.

Workforce and Supply Chains

We rely on the skills, experience and commitment of our people to create sustainable value. Attracting, developing and retaining the best people is crucial in enabling us to meet our business goals. We have a skilled workforce of 7,260 (including unionised and non-unionised workers); as well as 12,516 contractors and 903 construction workers, who provided services along our full value chain during 2023, supported by an experienced and purpose-led leadership team.

Most of our workforce is allocated to our mining operations, representing 90% of our workforce. Exploration, development & construction and corporate staff represents 10%.

Total workforce

Workforce	Headquarters	Exploration	Development Projects	Operation	TOTAL
Non-unionised employees	129	161	18	1,272	1,580
Unionised employees				5,680	5,680
Contractors	16	440	301	11,759	12,516
Construction			903		903
TOTAL	145	601	1,222	18,711	20,679

Workforce distribution across business units

		Unionised personel	Non-Unionised personel	Contractor personel	Construction
Operations	Herradura	1,595	189	1,604	91
	Noche buena	72	13	83	
	Fresnillo	1,278	283	2,852	132
	Saucito	1,200	288	2,631	202
	San Julián	610	187	2,024	211
	La Ciénega	569	142	1,010	61
	Juancipio	356	170	1,555	206
Advanced projects	Proyecto Orisyvo		3	63	
	Centauro Profundo		7	46	
	Guanajuato		8	192	
HQ	Headquarters		129	16	
Exploration offices	Exploration Of. Chihuahua		49	94	
	Exploration Of. Hermosillo		28	182	
	Exploration Of. Zacatecas		23	48	
	Exploration Of. Toluca		27	59	
	Exploration Of. Peru		16	41	
	Exploration Of. Chile		18	16	
	TOTAL WORKFORCE	5,680	1,580	12,516	903

Supply Chains



Critical suppliers are those that provide Fresnillo plc with goods and services that i) have the greatest impact on operating costs, ii) their quality could affect our processes, iii) are scarce or the supplier is the only source, and iv) their purchase and/or import is restricted. For these critical suppliers, we have a monitoring and evaluation program in place that covers their business management, as well as sustainability issues such as climate change, water management, human rights, community relations, and diversity, equity, and inclusion. From these assessments, we identify risks, their sustainability maturity, as well as strengths and areas of opportunity in their organizational structure and select suppliers to participate in skill-building programs.

Contractors

Before beginning activities in any operational area, all new contractor personnel receive five days of safety training and participate in specific courses such as rock mechanics, firefighting, search and rescue, first aid, and emergency response. We hold annual meetings in which we recognize our contractors' safety performance, and we encourage them to develop their own safety recognition mechanisms for their employees. We require them to provide their people with adequate working conditions, accommodation, food, services, and recreation.



Stakeholders

We rely on strong relationships with our stakeholders to fulfil our Purpose of contributing to the wellbeing of people, through the sustainable mining of silver and gold. We have identified our relevant stakeholders by considering their influence on the success of our business model and strategy.

Our key stakeholders are:

Stakeholder	Relevance
1) Employees and Unions	An experienced and motivated workforce is fundamental to Fresnillo's ability to be a sound business and deliver strong financial and ESG performance.
2) Communities	Mutually beneficial community relationships build long-term trust and collaboration.
3) Government	building strong relationships will support positive recognition and outcomes.
4) Contractors & Suppliers	Capable contractors are valuable members of our workforce, performing specialised works and services that provide essential support to our operations, projects and exploration.
5) Minority shareholders	Continuous investment makes it possible to contribute to the wellbeing of people, through the sustainable mining of silver and gold.

Fresnillo uses a variety of engagement opportunities to generate both direct and indirect feedback. Through collaboration and dialogue, we are able to gather each stakeholder's concerns and priorities on specific topics. For the purposes of addressing the issue of Modern Slavery in the relevant section of "Engagement" we will deep down in how we engage with two of our stakeholders:

- Employees & Unions
- Contractors & Suppliers

Governance and Workforce Engagement

Governance

The Board strives to create a workplace culture where everyone feels valued, supported, and inspired to contribute their best, encouraging creativity, innovation, and collaboration through open communication, empathy, and a shared commitment to wellbeing. The Board believes that our workforce is the foundation that supports our business model and their dedicated contribution is instrumental in building a more sustainable future, both for our business and the planet; therefore the wellbeing of our people alongside an ethical and inclusive culture are the drivers of higher levels of employee engagement and are essential to attract and retain talent. In this context, it is a duty of the Board to oversee workforce policies and practices and ensuring they are consistent with the Group's values and support its long-term sustainable success.

The Health, Safety, Environment, and Community Relations (HSECR) Committee, assists the Board by collaborating with management to meticulously supervise the Company's strategies, ensuring that they effectively address environmental, social, and governance (ESG) considerations, including the active scrutiny and oversight of the policies that address modern slavery risks.

Workforce Engagement

The Board and its Committees receive information related to the workforce through a range of channels, including direct engagement, as shown in the diagram below. This Board-level engagement process enables the Board to understand the views of the workforce on their experiences of working for the Company as well as providing an additional mechanism to raise concerns. For this purpose, Mr Arturo Fernández has been designated as the Non-executive Director to represent the workforce in the boardroom.

Workforce engagement: communication and feedback



During 2023, Mr. Fernández led two in-person sessions in Fresnillo city to gain first-hand knowledge of the views of our workforce. These sessions brought together representatives from the Company's operations in the Fresnillo District (Fresnillo, Saucito and Juanicipio), including unionised and non-unionised personnel, with the appropriate balance of demography and responsibilities. The sessions' agendas reflected relevant workforce-related issues to encourage a candid discussion regarding "safety and wellbeing" from a holistic perspective.

The openness and candour expressed during this engagement session provided important insights such as: the sense of pride in working for the Company, appreciation of investment in training and professional development, recognition of good job benefits in comparison to our competitors, and a recognition of the improvements in corporate communication. Areas of concern included security surrounding our operations, safety incidents and turnover rates, flexible working schedules, salary and wages in the context of inflation.

Building on the insights gained through our workforce engagement efforts, we have implemented comprehensive, multifaceted initiatives to address longstanding concerns in three key areas:

- **Strengthening industrial safety:** we are working to enhance accountability, operational discipline, rigorous verification of critical controls, near-miss reporting, and visible leadership, while also promoting the 'workers right to say no to unsafe conditions' campaign.
- **Understanding health holistically:** our objective is to encourage healthy habits and disease prevention through permanent campaigns; we also implement initiatives that address emotional aspects, supporting our psychosocial risk factors prevention strategy.
- **Improving whistleblowing awareness:** we aim to provide certainty and trust in the whistleblowing process, in particular around confidentiality and protection from retaliation.

We have not received any modern slavery complaints through this channel that allows frank and safe dialogue between workers and the Board.

How we engage with employees and unions

We engage to understand employee areas of interest and concern, along with fostering open dialogue and collaboration with unions that will inform decision making.

The way in which collaboration with unions is carried out, plays a key role in the protection of rights and this closes doors to risks of modern slavery, child labour, forced labour, impacts on human rights.

Management

- Union engagement across relevant employment, workplace safety and critical controls.
- Safety symposium and LEAL survey, in collaboration with the union, on work behaviours and wellbeing, leveraging insights to enhance our workforce engagement strategy.
- Surveys to better understand the issues that matter to our workforce.
- Interviews and focus groups to understand employee perceptions of our social performance in the communities where we operate.
- Comprehensive programme to prevent and address harassment in the workplace.

What issues matter to our employees and unions

- Ethics and integrity.
- Health and safety in the workplace.
- Security in the regions where we operate.
- Organisational culture.
- Remuneration (including statutory profit-sharing).
- Labour and human rights.
- Preventing and addressing workplace harassment.
- Diversity, equity and inclusion.

Outcomes from our engagement

Actions:

- Maintain a synergistic relationship with the union and authorities.
- Strengthen our health strategy by promoting wellness programmes, preventive care and healthier lifestyles.
- Champion skills development through immersive workshops tailored for unionised local committee members, newcomers and aspiring individuals.
- Deploy the leadership standards, laying out responsibilities and accountability both for leaders and operational teams, aimed at fortifying our preventive safety culture.
- Enhance operational discipline by intensifying efforts in safety awareness, training, and supervision along our entire command line.

Decisions:

- Intensify the 'I Care, We Care' programme with an enhanced focus on verification of critical controls, visible leadership, operational discipline and accountability, safety training and empowerment.
- Create the 'Wellbeing Committee' to provide oversight of the deployment of the 'Living in Balance' programme's initiatives.

Outcomes:

- Positive relations with workers and unions.
- No strikes affecting our capacity to operate.
- Increase in near-miss reporting.
- Continued improvement in gender diversity.
- Certification of mining units as Safe and Healthy Working Environments (ELSSA) by the Mexican Social Security

How we engage with contractors and suppliers

We engage to strengthen our safety culture and alignment with our values and ethics.

The way in which security, harassment prevention, ethics and integrity practices are developed with contractors indirectly help us prevent serious impacts on human and labour rights.

Management

- Recognition of contractors as valuable members of our workforce.
- Regular engagement and capacity building through the 'I Care, We Care' initiative.
- Involvement of contract owners in accident or incident investigations.
- Enhanced controls to assure compliance with their tax and labour obligations.
- Necessary endorsement of our Code of Conduct for Third Parties.
- Due diligence procedures to verify the ethical profile of new contractors and suppliers.
- Capacity building of contractors to implement measures to prevent and address harassment.
- Focus groups with contractors to better understand our social performance in local communities.

What issues matter to contractors and suppliers:

- Productivity/development rates.
- Health and safety in the workplace.
- Security in the regions where we operate.
- Labour and human rights.
- Preventing and addressing harassment.
- Diversity, equity and inclusion.
- Ethics and integrity.

Outcomes from our engagement

Actions:

- Safety meetings between management and key business partners at each mining unit, addressing safety opportunities and cross-functional cases for implementation.
- Dissemination of the 'Right to say no' policy to halt unsafe working conditions.
- Capacity building for contractors and accountability through the 'I Care, We Care' and anti-harassment programmes.
- Monitored the security situation and maintained clear communications with contractors.

Decisions:

- Intensify the field presence of operational leaders to ensure the systematic involvement, detection and addressment of potential risks.
- Update the safety annexe in mining works contracts to align and comply with our Company's prescribed guidance and standards.
- Facilitate effective communication and collaboration on issue addressment, transversal learning, regular meetings and tours, systematic monitoring and verification mechanisms.

Outcomes:

- Implementation of corrective actions to reinforce engineering control, personnel competencies and strengthening of the accountability processes.
- Training of contractor companies in the implementation of the mechanism to prevent workplace harassment.

For further reference of engagement with the other stakeholder groups please refer to Fresnillo's Annual Report 2023 available at [this link](#).

Organisational Climate

We administer biennial engagement surveys employing the **Basher methodology** to monitor organisational climate. It encompasses 60 items across seven key areas to evaluate employee and contractor satisfaction. The survey employs a dual evaluation scale, combining responses with the relevance they hold for each individual. The outcomes undergo comprehensive analysis across different cohorts, leading to discussions among leadership teams and relevant departments. Areas with the lowest scores, as well as specific items, are pinpointed and incorporated into existing programmes or integrated as focal points of new improvement plans.

Topics	Cohorts analysed
<ul style="list-style-type: none"> • Our working practices • Industrial safety. • Code of Conduct and compliance. • Management and leadership • Work environment. • Trust • Teamwork. 	<ul style="list-style-type: none"> • Process/Department • Organisational roles. • Age groups • Seniority • Gender. • Key personnel.

Although these surveys are not directed specifically towards detecting Modern Slavery in our workforce, the manifestations of unconformities that can be detected within these surveys may give insights about potential unintended impacts that could mean further exposure to human rights risks.

Whistleblowing Mechanism

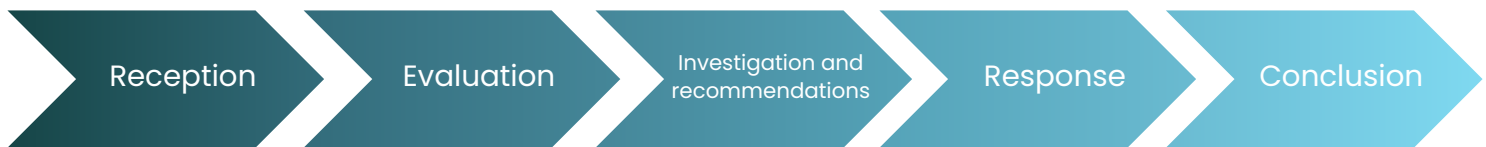
Our Whistleblowing Mechanism, known as 'Línea Correcta', serves as a confidential and secure channel for raising concerns regarding the Company's operations or any unethical behaviour which include concerns regarding inappropriate conducts that could affect human and/or labour rights. It is operated by Ethics Global, an external third-party provider, which ensures the anonymity of whistleblowers when filing a report. The Whistleblowing Mechanism is widely available to our employees, contractors, and other stakeholders such as suppliers and members of surrounding communities. The reports received are reviewed quarterly by the Honour Commission and monitored by the Audit Committee. Twice a year, the Board of Directors also receives reports at meetings.

We recently conducted a third-party survey to assess employee trust in the Whistleblowing Mechanism. Leveraging these insights, we developed a comprehensive plan aimed at enhancing the reception, handling, and resolution of reports related to unethical conduct. The overarching goal is to reduce risks associated to information leakage, reprisals, and to foster improved communication with the potential whistleblowers who utilise any reporting channel for violations to our Codes of Ethics and/ or Conduct. This plan will be implemented during 2024, featuring a campaign disseminating key aspects such as confidentiality, protection against retaliation, and how to effectively collaborate in an investigation. Additionally, we will also target workshops to strengthen the capabilities of key departments that are frequently featured in such reports.

This is one of the most important mechanisms we have to detect and address an incident of modern slavery. The characteristics of wide availability and knowledge, protection of anonymity, and rigorous investigation allow the protection of complainants and victims of severe human rights violations such as modern slavery.

Community Grievances

We maintain a strong track record of transparent engagement with our stakeholders to address any genuine concerns. Our grievance mechanism ensures a fair and effective resolution process to respond to concerns and resolve disputes. Each operating unit and current advanced project have dedicated Community Relations teams to effectively address stakeholder concerns. Grievances are documented and managed through a specialised system, with the Community Relations teams. The process involves thorough investigation and prompt resolution of concerns identified.



During 2023 we did not receive any Modern Slavery complaint through the grievance mechanism. For further information on the objectives for the communities of this mechanism please refer to the Fresnillo's 2023 Annual Report available at [this link](#) (page 141).



Implemented ACTIONS

We prioritise initiatives to enhance the overall wellbeing of our workforce, which aim to improve their quality of life, health, and have a safe and positive work environment. A culture that promotes and fosters the well-being of its workforce has a much lower tendency to incur situations of modern slavery.

Subject	Objectives
Diversity, Equity and inclusion	Foster an inclusive culture where diversity is not just acknowledged but celebrated, empowering every employee to realise their full potential. For more information see the section below 'Diversity Equity and inclusion'.
Harassment prevention	Commitment to build and maintain a safe work environment where the rights of all people who work in the company are respected, which is why we strengthen the right to privacy in the community of employees, union members and contractors to a job free of violence, to decent treatment, to physical and psycho-emotional health, for more information see the section below 'Harassment prevention programme'.
Safety	<p>'I care, we care program' - secure operations that function effectively and safely, ensuring zero fatalities, zero accidents, zero injuries and zero harm.</p> <p>In 2022, we established the 'I Care, We Care' operational committee to assist the Executive Committee and management in risk management and ensure a uniform and cross-functional deployment of the safety strategy across operations</p>
Health	<p>Ensure the physical and mental health of our workforce, addressing five main courses of action:</p> <ul style="list-style-type: none"> A. Health care: Check-ups, medical consultations and health campaigns B. Comprehensive wellbeing: Nutritional support, sports promotion and psychological support C. Industrial care: Ergonomics and industrial hygiene D. Innovation and development: Health technologies and software E. Emergencies: Emergency preparedness and training <p>Ergonomics Committee - to develop projects to improve ergonomics and industrial hygiene</p> <p>'Living in Balance' programme - help our people gain insights into their current physical, mental and emotional wellbeing – and to empower and guide them on a holistic journey towards an enhanced quality of life.</p>

Harassment Prevention Programme

In line with our purpose to enhance the wellbeing of people, we believe that a positive work environment not only contributes to overall wellbeing but also significantly influences productivity. The Harassment Prevention Programme serves as a cornerstone for fostering this positive environment. Through comprehensive training, we provide our workforce with the tools to effectively identify, prevent, and report workplace and sexual harassment. The delivery of face-to-face awareness workshops has also played a crucial role in establishing trust in the Whistleblowing Mechanism.

These workshops go beyond traditional training methods; they actively cultivate a welcoming and inclusive space for the exchange of ideas and experiences through hands-on activities and group dynamics, empowering them to effectively address harassment. The impact of these workshops is evident as attendees often respond positively, challenging and re-evaluating ingrained norms such as chauvinism or gender-based violence. Importantly, participants gain new perspectives and strategies to constructively address these issues.



During 2023, we conducted workshops for 4,732 employees and contractors. This ongoing effort ensures that every member of our team is well-versed in the Company's stance on workplace and sexual harassment since onboarding, fostering a collective commitment to maintaining a safe and respectful workplace.

This trainings and workshops allow the Company to address these cases and lay the groundwork for building confidence in the workforce to report human rights incidents, including Modern Slavery.

It is worth highlighting what the anti-harassment (labour & sexual) program contributes in terms of protection and restorative justice in cases of harassment since it has effects on the organizational culture that are very positive for the protection of other human rights.

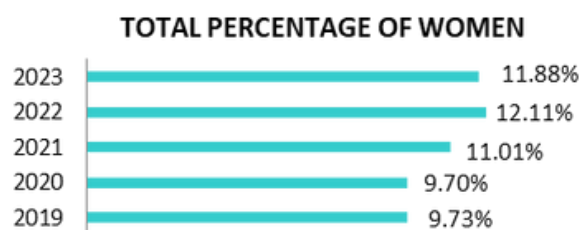
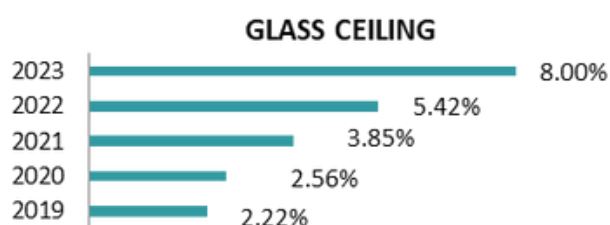


Diversity, Equity and Inclusion

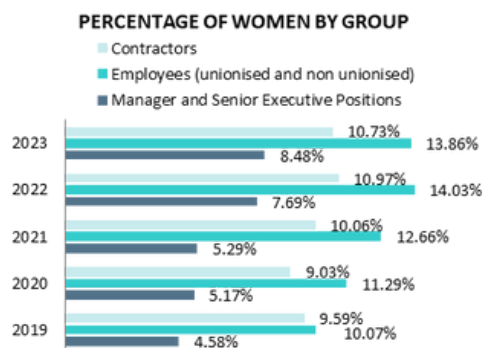
We understand that equity and inclusion are catalysts for talent attraction, retention, and development, fostering innovation and creativity. Upholding the principle of equality, we strive to create a workplace where everyone enjoys equal opportunities and is treated with respect. Our emphasis on openness, belonging, and respect establishes a supportive environment, enabling each individual to make a meaningful impact.

Our dedication to advancing diversity and inclusivity begins with a focus on increasing the representation and participation of women, recognising the inherent competitive advantage in embracing diversity. To achieve this, we've set two key objectives:

1. Enhance the contribution of women to the success of the Company.
2. Have a positive impact on female employees.



At the heart of our commitment lies the goal of attracting, developing, and retaining top talent and fostering a long-term relationship with our workforce. We prioritise maintaining a corporate culture deeply rooted in ethics and a genuine concern for our people's wellbeing. This commitment extends to respecting labour rights, engaging in constructive dialogue with union representatives and embracing diversity in our workforce, comprising unionised employees, non-unionised employees, and contractors. In this context, a more diverse, inclusive, with no tolerance to discrimination culture is conducive to a culture of zero tolerance for modern slavery and other forms of human rights abuses.



Over the years, we have made substantial strides in gender diversity, steadily increasing the percentage of women in our workforce, reaching 11.88% in 2023, up from 9.73% in 2019. We continue to close the gap on the country average, which currently stands at 17.3% according to data from the Mexican Mining Chamber.

While proud of our progress, we acknowledge there is more work to be done.

If we prevent discrimination, if we are more inclusive, we have a workforce that will be less tolerant of the forms of discrimination and inequality such as modern slavery. Community relations programs also have a large gender equality component.

You can learn more about our initiatives in the annual report at [this link](#).



Our POLICIES

Our policy framework reflects our commitment to protecting human rights and is consistent with our purpose to contribute to the wellbeing of people through the sustainable mining of silver and gold. It is based on internationally recognised declarations (the Universal Declaration of Human Rights, and the ILO Declaration of Fundamental Principles and Rights at Work) and applicable laws (UK Modern Slavery Act of 2015, the Mexican Constitution, and the Mexican Labour Law). Our policies are periodically reviewed to meet all regulatory requirements. They are approved by Fresnillo Executive Committee and, when appropriate, by the Board of Directors (according to the matters reserved for Board approval). Finally, they are made available on our internal portal and [Company's website](#), our workforce also receives training since their onboarding and regular updates throughout their careers. As well, we have an internal system where we publish all our policies and procedures, to ensure its availability for all employees.

At our organisation, it is imperative that all individuals, irrespective of their hierarchical position, as well as associated external entities such as, Board members, suppliers, and customers, display unwavering commitment to our policy framework. We firmly insist that all affiliated third parties wholeheartedly embrace the Code of Conduct for Third Parties as an obligatory prerequisite.

Policy	Description
<u>Code of Conduct</u>	<p>Applies to all our unionised and non-unionised personnel, sets out our values and individual commitments to conduct business ethically and outlines Company's human rights expectations. In Fresnillo plc we seek to:</p> <ul style="list-style-type: none"> • Demonstrate a well-established ethical culture through our behaviours and actions. • Promote fair and decent labour practices. • Ensure that the workplace is free from all forms of labour and sexual discrimination, bullying and harassment, as well as any retaliation. • Respect for the personnel rights to freedom of speech, association, and collective bargaining. • Prohibit child and forced labour in our operations and in our supply chain. • Respect and encourage the diversity and inclusion of all people. • Promote equal opportunities for men and women and not allow gender-based violence. • Promote our practices with contractors and suppliers.

Policy	Description
<u>Code of Conduct for Third Parties</u>	Requires current third parties to conduct themselves ethically, based on honest, respectful, transparent, equitable and fair relations, in strict accordance with the law and the Code's guidelines within their own value chains, thus generating a virtuous cycle that benefits the entire industry and the community at large. This declares that we expect our Third parties assume a commitment to protection of their employees' human and labour rights, by complying with all applicable and international labour and human rights regulations, including but not limited to the Modern Slavery Act.
<u>Sustainability Policy</u>	Expresses our commitment to create value for society through a responsible approach to mining, respecting human rights and the legal framework. Our Integrated Health, Safety, Environment and Community Relations (HSECR) Management System is the reference framework to comply with legal and other requirements, to adopt best practices, to set objectives and for continuous improvement.
<u>Due Diligence Policy</u>	Sets our commitment and procedures to diligently manage third party risks, including risks of bribery, corruption, money laundry, fraud, and human rights violations, including Modern Slavery.
<u>Diversity Policy</u> ¹	Sets our goals to develop an inclusive culture where our people feel valued and inspired to contribute to their fullest potential. We embrace diversity of gender, ethnicity, religious beliefs, age, geographical background, nationality and disability.
<u>Integrity Policy</u>	Establishes prevention, compliance, oversight, and accountability mechanisms for avoiding involvement in ethics and regulatory compliance violations by members of the organisation, due to their labour relationship, duties or the position they hold, in their business relations with third parties, particularly government agencies and public servants.
<u>Anti-retaliation Policy</u> ¹	Establishes that the Company does not tolerate any type of retaliatory action against persons who report, in good faith, violations to our code of conduct and policies. We consider retaliation as any form of: harassment, intimidation, threats, discrimination and/or coercion. If you become aware of any violations of our Code of Conduct, including instances of retaliation, or breaches of our internal or external regulations, we strongly encourage you to promptly report such incidents through the this link .

Policy	Description
Labour Equality and Non-discrimination Policy¹	Aims to foster of a culture of respect for human dignity, establishing organizational guidelines and mechanisms for the prevention, handling, and eradication of sexual and/or workplace harassment, and for the prevention and elimination of all forms of discrimination against any person, in order to promote equal treatment and access of opportunities, permanence and promotion in employment for all personnel regardless of the type of contract. This policy supports our commitment to be the best employment option for everyone, by offering real opportunities for development and recognition in a safe, equitable, inclusive, respectful work environment with equal opportunities, where our entire staff feels valued and inspired to contribute with their maximum potential.
Psychosocial risk prevention Policy¹	Establishes the guidelines and principles with which Fresnillo plc is committed to carry out the actions that allow it to identify, analyse and prevent psychosocial risk factors and workplace violence; as well as, to promote a favourable organisational environment in the workplace.
Human resource documents¹	There is a complete section of human resources documents, where you can find the employees labour benefits, recruitment process, incentives, succession and career plans, compensation.
Policy on policies¹	Establishes the guidelines for drawing up, update and publish the corporate policies and processes to be documented in the internal system, to ensure that all personnel can consult them. As well as supporting the definition of risks and controls of the process documented, and where appropriate, that there is alignment with applicable national and international regulations.

Any breach of our regulations can be reported through the whistleblowing line or to the Compliance Department, and sanctions will be carried out as appropriate. Also, Internal Audit reviews compliance with policies and procedures in the different processes of Fresnillo plc according to the audit plan.

Risk Assessment and MANAGEMENT

Given that Modern Slavery is a potential risk in our industry and in our region, it is important to present in this statement how Fresnillo plc addresses risk management.

Risk Governance Basis

The Board and the Executive Committee oversee our principal risks, and the Audit Committee and Internal Audit monitor the overall effectiveness of our risk management and internal controls framework. In addition, the operational level of our mining units also oversees risk management in their areas of responsibility, with insights from assurance and compliance activities. This process is explained in the following executive table:

We have three lines of defence (as a best practice risk governance model generally approved by

Committee of Sponsoring Organizations of the Treadway Commission - COSO framework and the Institute of Internal Auditors) to verify that risks are being effectively managed in line with our policy, standards and procedures, across our business processes.

With the leadership of the Board and the Executive Committee and guided by our risk appetite on a risk-by-risk basis, we understand, prioritise, and manage our risks. Our risk management framework, which we further enhanced during the year, enables us to undertake this exercise with structure and rigour. At the front-line operational level, all employees are required and empowered to identify and manage the risks that arise within their area of responsibility. This governance structure supports our risk management framework and enables effective management of material risks.



All the risk governance, including principal, individual and emerging risks.
Including personnel at mine sites, development projects, exploration sites and support areas.

Risk Management System

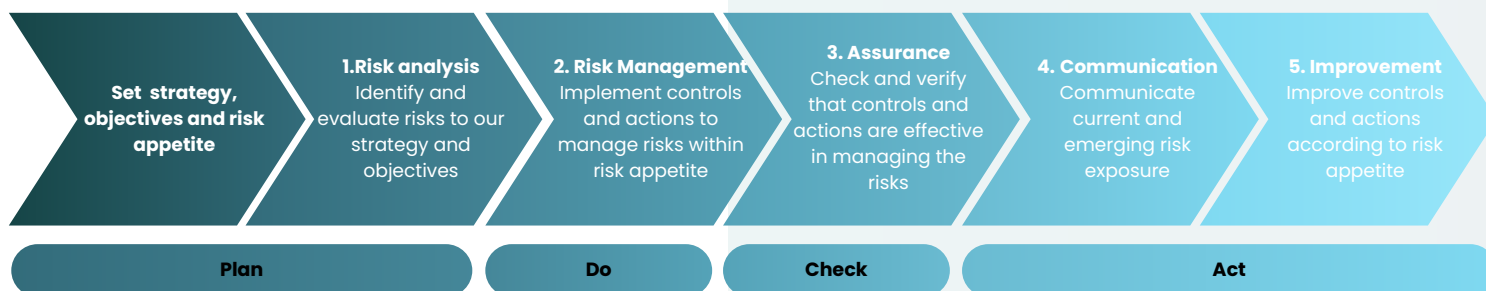
Our risk management system is based on risk identification, assessment, prioritisation, mitigation, and monitoring processes, which are continually evaluated, improved, and enhanced in line with best practice.

A complete view of our risk universe starts with the analysis of our business, the external environment in which we operate, the regulatory landscape and our internal operations. This includes the impacts on and of our strategy, initiatives, governance, and processes. In addition to our established risk management activities, our executives (including operations and project managers, the controllership group, Health, Safety, Security, Environment and Community Relations (HSECR) team and exploration managers) regularly engage in strengthening the effectiveness of our current controls. These actions support the executives and the Board in each of their responsibilities.

The Company's risk profile has been developed based on the most significant risks in our business. All our principal risks were reviewed at least twice during the year, including through Key Risk Indicators (KRIs), which were developed to help embed the risk appetite framework in the business and enhance the monitoring and mitigation of risks.

Effective risk management enables us to manage both the threats and the opportunities associated with our strategy, operations, and projects. Our risk management process helps us to manage material risks that have the potential to impact our business objectives. While risk management is a key accountability and performance criterion for our leaders, all employees have responsibility for identifying and managing risks. Our risk management framework reflects the importance of risk awareness across Fresnillo plc. It enables us to identify, assess, prioritise, and manage risks to deliver the value creation objectives defined in our business model.

Timely risk monitoring is at the core of our management practices, helping to deliver on our strategy and our commitments to stakeholders, including colleagues, communities, and the planet. We are focused on conducting our business responsibly, safely, and legally, while making risk-informed decisions when responding to opportunities or threats that present themselves.



Modern Slavery Risk Assessment

Our risk assessment aims to identify and evaluate actual and potential human rights risks, including Modern Slavery. Our approach to assessing the risks of contemporary forms of slavery is to:

1. Map our value chain to identify the country of origin of our suppliers¹.
2. Understand our global exposure with the Global Slavery Index.
3. Understand the human rights risks in the countries we operate.
4. Evaluate the list of human rights risks considering their likelihood, impact and the vulnerable groups.

This assessment indicates that our main exposure is in Mexico. We have factored in our understanding of the type of workforce employed throughout the value chain and the contractual arrangements used in Mexico. We have used our own analysis to identify potential risks in our communities where we operate.

As part of this assessment, we take into consideration the country risk factor, therefore the table below indicates the countries of origin of our main suppliers with their respective rates of prevalence of modern slavery:

Country of origin of our suppliers	Total percentage of procurement (purchases)	Prevalence of modern slavery index / Rank ²	Government Response Rating ³	Estimated proportion living in modern slavery ²	Vulnerability to modern ⁴
Mexico	90.72	64	55/100	6.6 / 1000	58/100
United Kingdom	2.51	145	68/100	1.8 / 1000	14/100
USA	2.37	122	67/100	3.3 / 1000	25/100
United Arab Emirates	1.03	7	50/100	13.4 / 1000	40/100
Sweden	0.93	156	63/100	0.6 / 1000	7/100
Others	2.44				

1. Latest available <https://www.walkfree.org/global-slavery-index/>

2. Measuring the scale of modern slavery in 160 countries. These national estimates of the prevalence per thousand people and number of people were calculated using individual and country-level risk factors of modern slavery.

3. Measuring national efforts to end modern slavery in 176 countries. The government response assessment provides a comparative look at the legal, policy, and programmatic actions that governments are taking to respond to modern slavery.

4. The vulnerability model estimates how vulnerable people in a country are to modern slavery and in what ways.

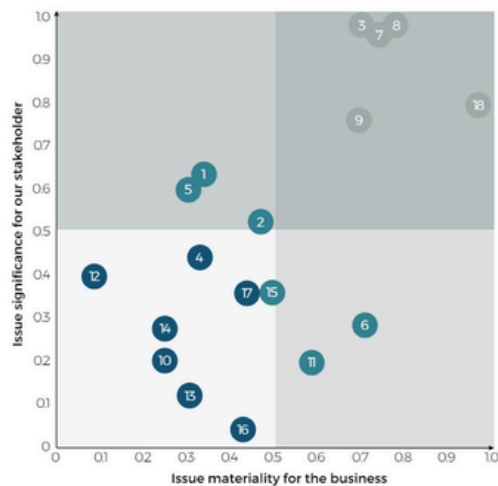
Materiality Assessment

We actively engage our stakeholders to gain deeper insight into the issues that hold significance for them and that are material to our business. This process, known as materiality assessment, serves as a crucial tool in holding our sustainability strategy. Because society and our industry are dynamic and expectations shift over time, we conduct in-depth materiality assessments every few years.

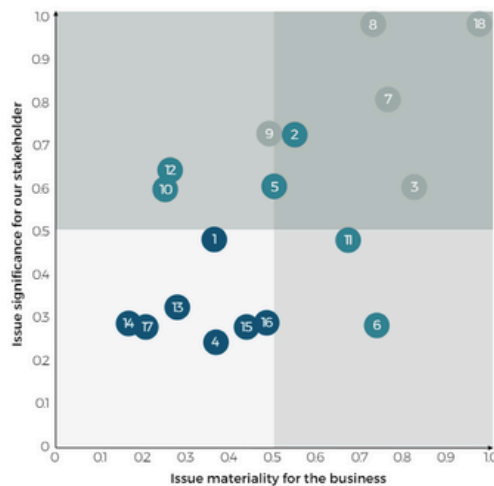
- Firstly, our relevant stakeholders are identified by a multidisciplinary team.
- Secondly, we employ a systematic approach to identify issues relevant to our industry by monitoring and evaluating reporting frameworks, international trends, regulations and compliance requirements, and review ESG questionnaires to capture emerging concerns and evolving expectations.
- Thirdly, we develop a structured engagement plan involving both internal and external stakeholders, utilising surveys and focus groups, to assess the current relevance of issues and include forward-looking questions to assess their anticipated relevance over the next decade.
- Finally, we integrate the materiality assessment outcomes into the sustainability strategy and reporting.



Materiality 2023



Materiality 2033



- 1 Biodiversity conservation
- 2 Climate change
- 3 Community relations
- 4 Data privacy and cybersecurity
- 5 Diversity, equity and inclusion
- 6 Environmental management
- 7 Ethics and corporate integrity
- 8 Governance, risk and crisis management
- 9 Health, safety and occupational wellbeing
- 10 Human rights
- 11 Innovation and technology
- 12 Mine closure
- 13 Relationship with government and authorities
- 14 Relationship with indigenous people
- 15 Responsible value chain
- 16 Talent development
- 17 Waste management
- 18 Water management

Due Diligence PROCESS

We maintain a rigorous, risk-based supplier management framework to ensure that we engage solely with reputable product and service providers and keep in place the necessary controls to ensure the traceability of all supplies (including avoiding any conduct related to modern slavery).

Our suppliers, contractors, and raw material shippers must meet our expectations for ethical behaviour and integrity, human and labour rights, occupational health and safety, and respect for communities and the environment.

Before doing business with a third party, we conduct a due diligence of their ethical profile, to determine the level of risk and the corresponding measures. The depth of this review is proportionate to the identified risks and according to the type, core business and characteristics of each party. We continually monitor compliance and may amend arrangements with third parties as needed. If the risks associated with a third party cannot be mitigated, the business relationship will be suspended. We have been conducting due diligence on third parties for many years, improving our review and investigation capabilities, and

recommending mitigation measures such as training, clarifying adverse media, enhancing contract clauses and internal authorizations, and enhancing audit rights, based on encountered risks.

A due diligence process is carried out for all our third parties, in accordance with the established policy, where the compliance of third parties with human and labour rights is reviewed.

In 2023, we successfully implemented new software to automate and optimise the third-party due diligence process. This transformation and standardisation consider the criticality of each third-party category with a risk-based approach, enabling us to efficiently detect alerts and establish a precise methodology for quantifying risk levels. The software facilitates informed decision-making regarding the initiation and continuation of business relationships with third parties. It also enhances greater traceability in operations with third parties, reduces response times, and streamlines the process for both external partners and internal personnel. Our efforts reflect our commitment to staying ahead of regulatory requirements, fostering efficiency and transparency in our operations.

We take our responsibility seriously and strive to work collaboratively with all stakeholders to raise awareness and prevent Modern Slavery in all its forms.



As part of the mentioned due diligence process, we review an overall status of our contractors regarding their compliance with their labour obligations (i.e., compliance Status with the Mexican Social Security Institute - IMSS). In line with this, we monitor our contractors to confirm that they properly enrol their employees with the Mexican Social Security Institute (IMSS) and other social security entities, thereby ensuring that benefits are made available. Mandatory compliance with the registry at the IMSS ensures the verification of the legal status of our employees and contractors to prevent the risk of human trafficking victims and child labour in our value chain. Access is denied at our Mining Operations to third- party contractors who do not comply with their IMSS enrolment requirement. In addition, we monitor compliance of their obligations to the healthcare and pension funds of their employees.

We perform efforts to verify that our contractors comply with the legal labour obligations, regarding the payment of social security fees of their employees, contribute to their legal retirement plans and respect the safety and health regulations and standards provided by the Company.

In 2023, we continued to implement our Code of Conduct for third parties, which clearly states that all partners must commit to safeguard their employees' human and labour rights, treating everyone with respect in a way that preserves their dignity and does not discriminate or violate their basic human rights and freedoms.

Our due diligence approach centres on social assessments in the communities and development of projects where we operate. These assessments enable us to identify risks and impacts on social, environmental, labour, and human rights matters, with the findings guiding the continuous improvement of our stakeholder engagement strategy and social management plans. In addition, we employ processes to early identify the presence of indigenous peoples at our concessions, informing our engagement approach. We unequivocally condemn any threats or intimidation mechanisms for corporate benefits, fostering an ethics culture and conduct that does not condone attacks on anyone, including those who may oppose our activities.

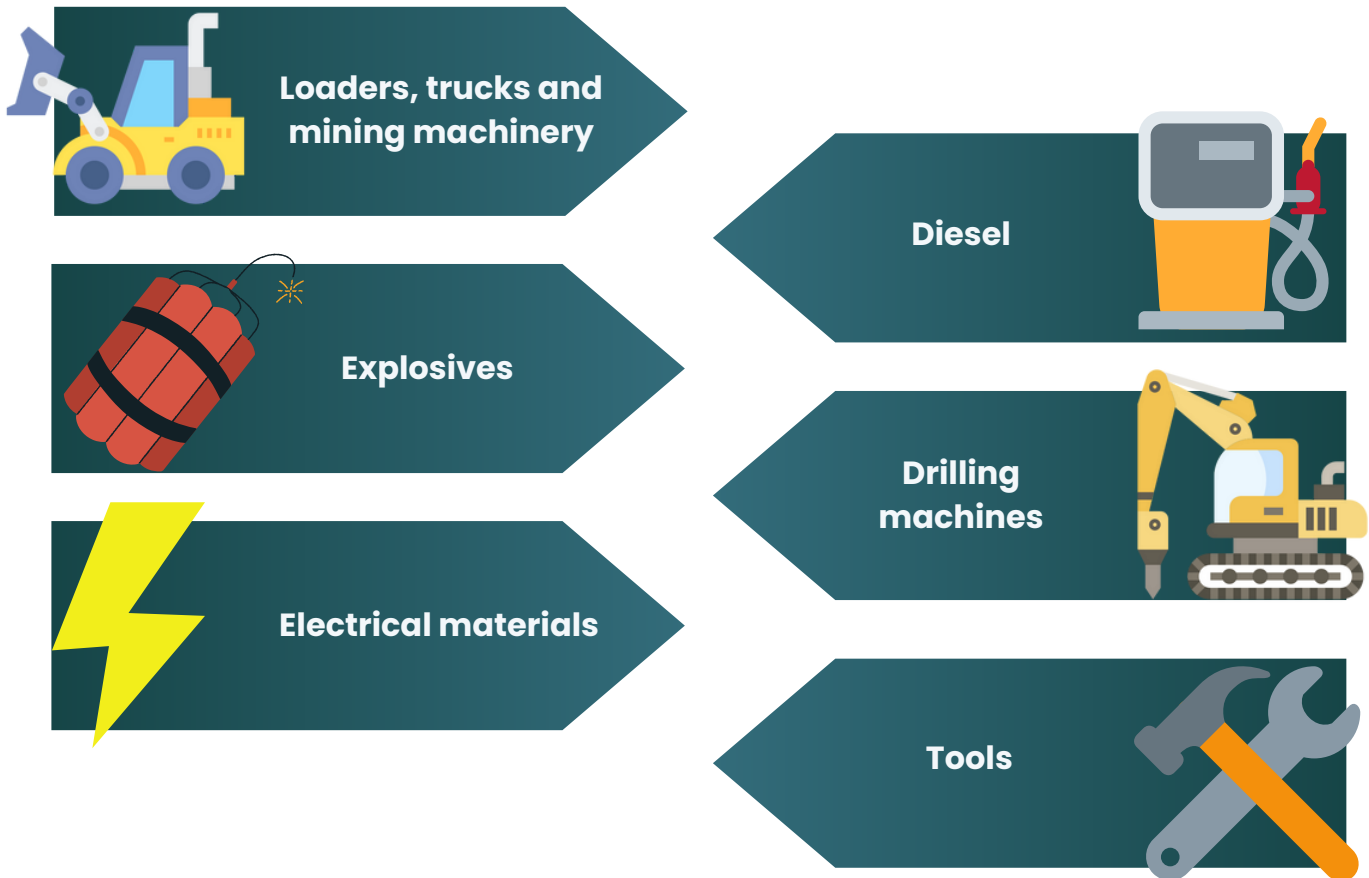


Sample of Due Diligence Questionnaire for third parties, regarding human and labour rights:

- ✓ Do you have a policy/standard/guideline/procedure/public positioning or another type of public document mentioning your commitment to respect human and labour rights?
- ✓ Do you have guidelines that prevent discrimination in your recruitment, hiring, training, job growth, career plans, compensation, transfer, discipline, dismissal and/or retirement based on residence, sex, national or ethnic origin, physical appearance, language, religion, marital status, disability, pregnancy and maternity, political affiliation, gender identity, sexual orientation, socioeconomic status, medical or any other condition?
- ✓ Do you have policies, procedures, strategies or programs that respect and promote gender equality, diversity and inclusion (particularly of people from vulnerable groups)?
- ✓ Do you offer decent working conditions, being the compensation, working hours and benefits at least those established by the current legislation that applies to you?
- ✓ Do you have guidelines that prevent and punish labour and sexual harassment in the working environment?
- ✓ Do you have protocols or guidelines that protect your workers from any condition in the work environment that could be detrimental to their safety, as well as to their physical and mental well-being?
- ✓ As part of your recruitment processes, do you check the age of your candidates to ensure that you offer work only to people who meet the minimum working age in accordance with applicable legislation and/or who are above the age set to complete compulsory education, considering the most restrictive requirement?
- ✓ Do you know what work activities are prohibited by law for teenagers between 15 and 17 years old?
- ✓ Conditional on "Yes" answer:
Do you comply with what is legally permitted and adhere to the fundamental conventions of the ILO, being that teenagers between 15 and 17 years old are only offered opportunities that aim to be legitimate apprenticeship or training programs in the workplace for the educational benefit of young people, such as internships?
- ✓ Do you use only labour hired by formal agreement of wills, and communicate the basic terms and conditions of hiring written on paper in the language understood by your job candidates?
- ✓ In the contracts you enter into with your suppliers, do you include a clause referring to the requirement to prevent, avoid and eradicate child, forced or from victims of human trafficking labour?
- ✓ Do you have mechanisms in place to prevent, report and, where appropriate, investigate cases of human rights abuses?
- ✓ Do you have any mechanism for redress or remediation in case your activities cause any serious impact on the human rights of your stakeholders?
- ✓ Do you provide training to your personnel regarding respect for human and labour rights?

Main Supplies

Fresnillo purchases goods and services across all stages of the mining cycle, from exploration and construction to mining operations, as well as mining closures. Where possible, Fresnillo buys local goods and services to develop procurement opportunities and economic development within the communities where we operate.



Procurement Team (individuals):

	Procurement	Contract management
Corporate	28	10
Local (in the business units)	13	8
TOTAL	41	18

Bribery and Corruption Prevention

The ethical behaviour of Fresnillo's personnel is the foundation to our compliance and human right's due diligence efforts. Thus, we strive to maintain a well-established ethical culture, demonstrated by our behaviour and actions.



Preventing bribery and corruption is fundamental to ensure high ethical standards that are not complicit with labour and human right abuses. One way in which corruption affects labour rights in Mexico is through the evasion of social insurance payments and pension fund contributions. By providing a framework that does not tolerate the presence of bribery and corruption within the Company's value chain, we foster an environment of zero tolerance to practices that could be conducive to labour and human rights risks.

We engage with diverse third parties, such as contractors, suppliers, logistics, law and advisory firms, unions, donation recipients, and government officers. We prioritise the cultivation of positive relationships while proactively managing potential risks such as bribery, corruption, money laundering, fraud, and human rights violations.

Our contracts provide clauses that prohibit conducts that constitute modern slavery. Also, our contracts set forth the right to carry on audits to assure that third parties comply with their obligations regarding modern slavery and the respect of human and labour rights. Our third parties are obliged to provide tax information related to the payment of salaries of the employees that have provided services for our company, as well as proof of payments of their social security contributions, upon Fresnillo's request. In the event that Fresnillo identifies that a third party does not comply with such obligations, Fresnillo is entitled to terminate the commercial relationship with the third party in question.

The ethical conduct of our workforce is key to achieving the Company's purpose. Adhering to applicable laws on bribery and corruption, including the UK Bribery Act 2010, the Mexican General Law of Administrative Accountability, the Mexican Federal Criminal Code, and the federal and state secondary laws applicable to anticorruption, is a fundamental commitment with which all our personnel comply. We also vigilantly monitor transactions and report on vulnerable activities, ensuring compliance with regulations on operations involving illicit funds and money laundering.

Our anti-bribery and anticorruption mechanisms align with international best practices and guidelines, including the United Nations Global Compact, fundamental conventions of the International Labour Organisation (ILO), and guidelines promoting corporate responsibility issued by the Organisation for Economic Cooperation and Development (OECD).

Our policy mandates:

- Maintain a zero-tolerance stance regarding any form of corruption and bribery.
- Report suspected bribery and corruption through our institutional Whistleblowing Mechanism ('Línea Correcta').
- Investigate all bribery and corruption reports.
- Avoid doing business with third parties where concerns have been raised regarding bribery or corruption, or suspicions raised that the third party may engage in such activities on our behalf, following our analysis and due diligence evaluation process.
- Record transactions accurately and transparently in accounting books and accounts.

We operate with a robust compliance framework that oversees strategies and initiatives with a preventive focus to avert situations related to bribery and/or corruption, to ensure compliance with applicable internal regulations. These efforts encompass processes, areas, and individuals responsible for maintaining an anti-bribery and anti-corruption stance due to their nature or high level of exposure. Disciplinary measures for individuals involved directly or indirectly in bribery and corruption, including third parties, may range from legal measures to the termination of their employment contract, in the case of our workforce, or termination of business relationships in the case of third parties.



Effectiveness

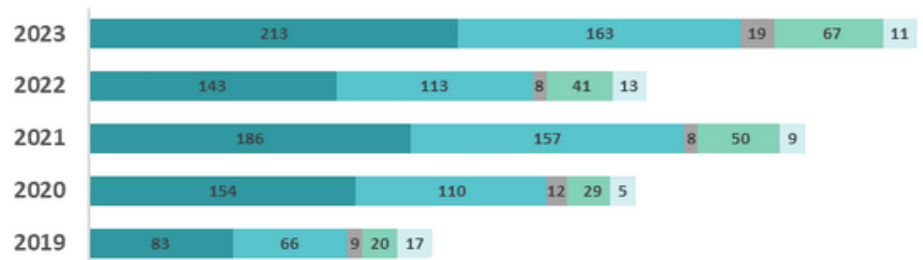
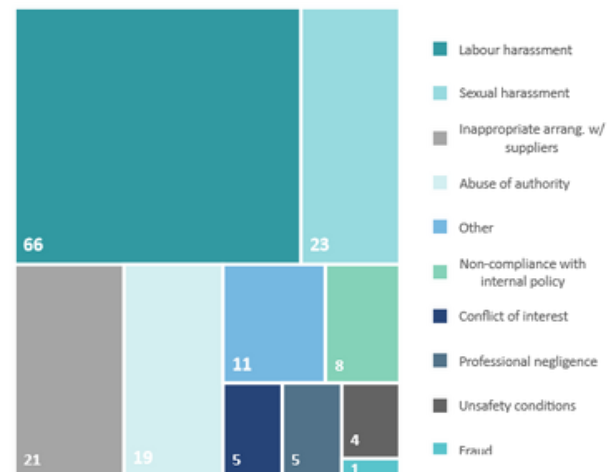
KEY PERFORMANCE INDICATORS

Assessment and Effectiveness

No modern slavery complaints were received in 2023 through our community grievance mechanism or our whistleblowing line, however we received 89 alleged harassment cases (of 163 reports received to our whistleblowing line), which were expected after training and communications efforts towards countering harassment, observing an increase in complaints compared to the previous year. We attribute this result to the continued dissemination of our reporting mechanisms and, notably, the growing trust among our personnel to report instances of workplace harassment. We anticipate this trend will continue into 2024, supported by the project to enhance trust in the Whistleblowing Mechanism.

The whistleblower hotline may be used by anyone who wishes to raise concerns, in confidence, about the Company's operations. The hotline is used by employees, contractors and, occasionally, other stakeholders such as suppliers and local communities. The use of the Company's whistleblower agreements is monitored quarterly by the Audit Committee. In 2023, there were a total of 163 reports (compared to 113 in 2022).

Type	2023	2022
Labour harassment	66	43
Sexual harassment	23	11
Inappropriate arrang. w/suppliers	21	15
Abuse of authority	19	17
Other	11	3
Non-compliance with internal policy	8	7
Conflict of interest	5	6
Professional negligence	5	4
Unsafety conditions	4	-
Fraud	1	-
Misuse of assets	-	3
Breach of trust	-	2
Inappropriate behaviour at work	-	2
Total	163	113



■ Whistleblowing - Number of reports
 ■ Whistleblowing - Number of cases
 ■ Tone from the top - Number of reports related to managers
 ■ Discipline - Number of disciplinary actions
 ■ Discipline - Number of control reinforcement

Community grievances statistics

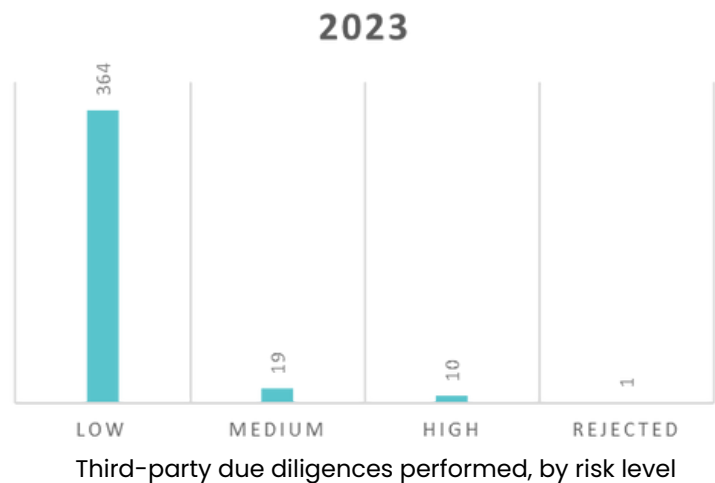
	2023	2022
Outstanding grievances from previous periods	10	11
New grievances received in the period	21	11
Total grievances	31	22
Closed grievances in the period	(25)	(12)
Outstanding grievances at the end of the period	6	10

We have not received community complaints about or related to modern slavery through our community grievances mechanism.

Due diligences performed

In 2023, a total of 394 third-party due diligence requests were met. As a result of the analysis, Compliance personnel assigned the following risk levels: low, medium, high and rejected. In the chart you can see the due diligences results of 2023.

All contractors in our operations and projects complied with the responsibility to register their workers at the Mexican Social Security Institute - IMSS which means they were verified to comply with controls, that contribute to prevent child labour, human trafficking, and healthcare access.



Training and **RAISING AWARENESS**

Ethics Culture

Respecting human and labour rights is a very important part of our ethics culture which we foster across all our organisation. As a company, we hold ourselves to the highest ethical standards and believe that our actions and behaviour should always reflect our corporate values: Confidence, Responsibility and Respect, Integrity, and Loyalty (CRIL). We expect our workforce and related third parties to consistently embody and adhere to these standards and to our Code of Conduct.

In 2023, we conducted a comprehensive review of our Code of Ethics and Conduct, streamlining and categorising all aspects related to legal and regulatory compliance. This included crucial matters such as the prevention of money laundering, safeguarding personal data, and contracting specialised services in alignment with the Mexican labour reform, that although already embedded within internal policies, required further clarification and transparency. As an additional measure, we also introduced a provision requiring our personnel to decline any gifts from third parties.

Since 2016 we have actively participated in Ethisphere's™ Most Ethical Companies survey, using its Ethics Quotient® to regularly assess and monitor our ethical culture and identify international best practices, as well as to track our progress towards maintaining and improving our own practices. As a result of our latest exercise, we have generated initiatives that we will roll out during 2024 to strengthen our ethical culture and integrity practices in the following years.



Training and Capacity Building

Our compliance programme and communications aim to foster a desired set of culture and behaviours within the Company and our stakeholders.

Training	Stakeholders reached	Objective
Code of conduct	1,569 Non-unionized employees (100% by the time of the training)	Onboarding session covering key compliance policies – such as donations, political contributions, promotional expenses, government relations, and the use of the whistleblowing line – and an annual evaluation and endorsement of the Code, requiring a declaration of potential conflicts of interest
Integrity and regulatory compliance training	31 Engineers in Training	Integrity-related onboarding workshop for new generations of the trainees' programme.
Key integrity and compliance matters	Key areas within business units in the Fresnillo District (93 people)	Face to face workshops focused on: Regulatory compliance, Conflicts of Interest, and Harassment Prevention.
Labour and Sexual Harassment	Total of 4,732 unionized and non-unionized employees and contractors	Covering fundamental concepts around harassment, emphasising our zero-tolerance stance. The course also provides guidance on the reporting mechanism for any situations they may experience or witness.
Third-Party Code of Conduct	538 people, including owners, legal representatives, and residents from our third parties	Online workshops, covering essential topics to enable alignment with our integrity policy, organisational values, and Third-Party Code of Conduct. Subjects included Human Rights responsibility, due diligence, responsible supply chain, conflicts of interest, bribery and corruption, expected behaviours, and our whistleblowing mechanism.

Labour and Sexual Harassment workshops given to new employees, union members and contractors during 2023 by business unit.

Business unit	Stakeholders reached
Ciénega	208
San Julián	231
Fresnillo	1,471
Saucito	1,357
Juanicipio	1,382
New projects	66
Herradura	17

As a strategic initiative, our senior executives underwent targeted training on preventing Labour and Sexual Harassment, facilitated by an external consultancy. The Virtual Campus also played a pivotal role by delivering 188 microlearning capsules on discrimination and DEI to employees, contributing to a more informed and inclusive workplace culture.

We also conduct permanent campaigns to engage our entire workforce through various channels, such as emails, posters, infographics, videos, computer screensavers and a dedicated internal portal for ethics and compliance topics to ensure that key aspects of our Code of Conduct and internal policies are effectively communicated and understood.

Moving forward, our commitment remains unwavering. We will persist in our efforts to prioritise the wellbeing of our people through ongoing training, addressing grievances promptly, dispelling myths surrounding workplace culture, fortifying our organisational values, and actively encouraging the use of our various reporting channels, with a particular emphasis on our Whistleblowing Mechanism. Through these measures, we aim to sustain a workplace where every individual feels heard, respected, and secure, reducing the risks and impacts on human rights, including the most severe manifestations such as modern slavery.



Looking AHEAD

Workforce wellbeing and engagement

- Continuing to implement our diversity and anti-harassment programmes, using them as platforms to raise awareness about modern slavery.
- Maintaining a corporate culture grounded in ethics and a genuine concern for our people's wellbeing.
- Maintaining fair and respectful relationships with unions, which is essential to building trust and mutual accountability.
- Continuing an open dialogue with our contractors and suppliers on safety and health measures, as well as prevention of harassment, human rights, and modern slavery.

Capacity building

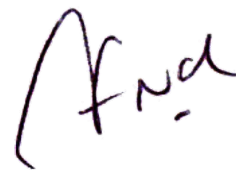
- Developing further training in relation to our Modern Slavery policy for our non-unionised employees.
- During 2024 and 2025, deploy the "Train the trainers" program to provide training for our key contractors in business units, covering essential topics to enable alignment with our integrity policy, organisational values, and Third-Party Code of Conduct (which include the respect to labour and human rights).

Risk management

- Develop a specific risk assessment for Modern Slavery risks in our workforce and supply chain.
- Review our actions to prevent Modern Slavery against best practices to develop targeted improvement strategies that mitigate this risk.
- During 2024, we will document a procedure of Supplier and contractor evaluation, that includes the revision of their ethical profile related to our due diligence process.

The Board and the HSECR Committee will continue to review these issues and remain absolutely committed to preventing Modern Slavery practices in whatever shape or form.

Yours faithfully,



Arturo Fernández,
Chairman of the HSERC Committee
Fresnillo plc Director, on behalf of the Board of
Directors 28th June, 2024

This statement is made pursuant to the U.K. Modern Slavery Act of 2015. On 25 April 2024, the Board of Directors of the Company discussed the obligation to publish this statement. After such discussion, the Board approved issuing and publishing the statement and delegated its authority to do so to the Health, Safety, Environment and Community Relations (HSECR) Committee. This statement covers the year 2023 from January 1st to December 31st. For more information, please visit the Company's annual report and our website at www.fresnilloplc.com.