

Fresnillo plc

2024

# MODERN SLAVERY STATEMENT





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# LETTER FROM OUR CEO

At Fresnillo plc, we uphold a zero-tolerance approach to Modern Slavery, seeking that no form of forced labour, child labour, or human trafficking exists within our operations or supply chain.

In 2024, 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 64<sup>th</sup> worldwide according to the Global Slavery Index. Recognising this latent risk, we continue to reinforce stringent oversight in our operations and exploration projects in Mexico, Chile and Peru, and across our supply chain.

Our commitment to responsible business practices has been integral to our operations since endorsing the United Nations' Global Compact in 2009. Upholding rigorous standards and accountability for our Environmental, Social, and Governance (ESG) practices, we aim to ensure that our business partners align with our organisational values, strengthening supplier accountability.

This year, we have further intensified our efforts, performing a risk assessment of our most critical suppliers and contractors regarding Modern Slavery. We carried out interviews and workshops. The assessment concluded a medium level risk exposure—within industry parameters.

Through permanent campaigns that socialise our Code of Ethics and Conduct and Third-Party Code of Ethics and 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. We recently issued an updated Third-Party Code of Ethics and Conduct which strengthens our efforts to foster an ethics and integrity culture with our business partners.

Looking ahead, we will continue to assess Modern Slavery risks within our workforce and supply chain, further aligning with global best practices. Also, we will conduct training on understanding and identifying Modern Slavery across our business. This training will be a module of our annual compliance programme training.

This year's statement outlines our ongoing efforts to prevent Modern Slavery, reinforcing our commitment to transparency, accountability and continuous improvement.



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Octavio Alvidrez  
Chief Executive Officer, Fresnillo plc

# KEY HIGHLIGHTS 2024

1

We conducted a comprehensive Modern Slavery risk assessment of our critical suppliers and contractors, this involved interviews, process mapping, workshops and direct engagement with risk owners and key suppliers. The assessment concluded a medium level risk exposure—within industry parameters.

2

We incorporated explicit criteria on forced labour risk and human rights policies in our supplier evaluation procedure, which will be carried out to selected critical suppliers.

3

We issued an updated Third-Party Code of Ethics and Conduct, aligned with the United Nations Global Compact principles on human rights, labour practices, environment and anti-corruption.

4

Our precious metals meet responsible sourcing standards per the London Bullion Market Association (LBMA) requirements—in compliance with OECD Due Diligence Guidance—supporting our client Met-Mex's certification and ensuring a conflict-free supply chain.





# INTRODUCTION

At Fresnillo plc (“Fresnillo” or the “Company”) we are committed to upholding human rights and do 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 supply chain. Inspired by our purpose to contribute to the wellbeing of people through the sustainable mining of silver and gold, we prioritise the adoption 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. This approach contributes to creating value for all our stakeholders, including our workforce, minority shareholders, local communities, suppliers and the authorities.

Our policy framework regarding ethical culture encompasses the respect of labour rights and fostering a culture that prevents Modern Slavery. We encourage the reporting of any suspicion of cases of Modern Slavery or human rights violation.

We collaborate closely with our partners in the supply chain to prevent and address potential impacts on human rights. Through our contracts and Third-Party Code of Ethics and Conduct, we set the tone for our suppliers and contractors to join our efforts to reject Modern Slavery in all its forms.

In addition, we provide workshops for our contractors on our Third-Party Code of Ethics and 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.



# MODERN SLAVERY CONTEXT

Our core operations are concentrated in Mexico, and we have early 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 focus on Mexico, 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". 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<sup>1</sup>. 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"<sup>2</sup>. Women, children and men of all ages and backgrounds can become victims of this crime, which occurs in every region of the world.

<sup>1</sup>ILO, Global Estimates of Modern Slavery, Forced Labour and Forced Marriage, September 2022.

<sup>2</sup>United Nations Office on Drugs and Crime



## Modern Slavery Context in Mexico

The mining operations that represent our core operations are located in Mexico. According to the 2023 Global Slavery Index in Mexico<sup>4</sup>:

**6.6 per 1,000 people**  
 Prevalence of modern slavery

**850,000**  
 People living in forced labour or marriage in 2021

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

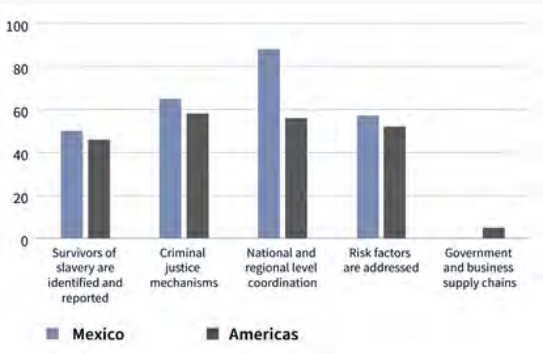
**58/100**  
 Vulnerability to modern slavery\*

**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



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

<sup>4</sup>Walk Free 2023, Global Slavery Index 2023, Minderoo Foundation. Available at: <https://www.walkfree.org/global-slavery-index/>

Following the ratification of the “Protocol of 2014 to the Forced Labour Convention 1930” in June 2024, Mexico amended its Human Trafficking Law to include working hours that exceed legal limits as a form of labour exploitation. This change took effect on June 8, 2024.

### Legal Framework in Mexico:

- The Mexican Constitution forbids forced labour and inhumane work conditions.
- The Mexican Human Trafficking Law (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 Mexican Labour Law (Ley Federal del Trabajo) regulates labour rights and working conditions, and the labour reform regarding outsourcing.

### Relevant Government Agencies in Mexico:

- The Mexican Labour Ministry.
- National Human Rights Commission.
- National Institute of Migration.
- Executive Commission for Attention to Victims.
- Special Prosecutor's Office for Violence against Women and Human Trafficking.
- Interinstitutional Commission against Human Trafficking.

## Modern Slavery Context in Chile and Peru

In addition to our mining operations in Mexico, we have early-stage exploration projects in Peru and Chile. Given our presence in these countries, we find it important to provide context of Modern Slavery risk in these regions<sup>5</sup>:

Country	Global ranking in prevalence of Modern Slavery	Regional ranking in Modern Slavery (Americas)	Estimated prevalence of Modern Slavery (per 1,000 of population)	Estimated number of people in Modern Slavery	Population
Peru	55	10	7.1	234,000	32,971,846
Chile	125	23	3.2	61,000	19,116,209

This data highlights the importance of responsible business practices and due diligence in our supply chains and operations in these jurisdictions.

<sup>5</sup>Source: Walk Free 2023, Global Slavery Index 2023, Minderoo Foundation. Available at:<https://www.walkfree.org/global-slavery-index/>



# STRUCTURE, BUSINESS & SUPPLY CHAINS

## 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 by-products, including lead and zinc.



Headquartered in Mexico, we draw 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 18,095 people and contributing some US\$2,152.5 million in economic value distributed in 2024.

Regarding the destination of our products, during 2024 we sold 99.6% of the production to Met-Mex, the metallurgical complex of "Industrias Peñoles S.A.B. de C.V." (hereinafter referred to as "Industrias Peñoles")—who is also our Parent Company, owning 75% of Fresnillo's shares, and our main services provider—. Met-Mex smelts, refines and commercializes our products, introducing them into the market. See stage 4 in diagram above for reference.



# Organisation Structure

We have the following operating mines, all located in Mexico: Fresnillo, Saucito, Juanicipio, Ciénega, Herradura, Noche Buena, San Julián and Soledad-Dipolos<sup>6</sup>.

To ensure the long-term sustainability of our business, we actively explore and develop new projects. In addition to our operating mines, we have four advanced exploration projects—Orisyvo, Guanajuato, Rodeo and Tajitos—as well as numerous early-stage exploration projects and prospects in Mexico, Peru and Chile.

For more information about Fresnillo's subsidiaries in which Fresnillo holds direct investments, refer to Fresnillo's 2024 Annual Report [here](#) [pages 271-272].

## 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 stakeholders are:

1. Employees and Unions
2. Communities
3. Government
4. Contractors and Suppliers
5. Minority Shareholders

We use a variety of engagement opportunities to generate both direct and indirect feedback. Through collaboration and dialogue, we can gather each stakeholder's concerns and priorities on specific topics. For more information about how we engage with our stakeholders please refer to our 2024 Annual Report [here](#) on [pages 22-28]



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<sup>6</sup>Operations at Soledad-Dipolos are currently suspended.

## Workforce & Distribution

We rely on the skills, experience and commitment of our people to create long-term value. Attracting, developing and retaining top talent is crucial in enabling us to meet our business goals. We have a skilled workforce of 7,179 unionised workers and employees; and 10,916 contractors who provided services along our full supply chain during 2024.

Workforce	Headquarters	Exploration	Development Projects	Operations	TOTAL
Non-unionised employees	156	159	15	1,262	1,591
Unionised employees				5,590	5,588
Contractors	16	658	272	9,985	10,916
Construction			402		402
TOTAL	172	817	689	16,837	18,497

## Distribution in different business units

Most of our workforce is allocated to our mining operations, representing 91% of our workforce. Exploration, development & construction and corporate staff represents 9%.

		Unionised personnel	Non-unionised personnel	Contractor personnel	Construction
Operations	Herradura	1,748	202	1,462	77
	Noche Buena	64	10	87	
	Fresnillo	1,175	277	2,378	67
	Saucito	1,178	288	2,463	161
	San Julián	508	173	1,559	30
	La Ciénega	542	140	812	5
	Juanicipio	373	164	1,224	62
Advanced projects	Proyecto Orisyvo		3	56	
	Centauro Profundo		4	47	
	Guangjuato		8	155	
Exploration offices	Headquarters		163	16	
	Exploration Of. Chihuahua		48	231	
	Exploration Of. Hermosillo		29	95	
	Exploration Of. Zacatecas		25	72	
	Exploration Of. Toluca		29	166	
	Exploration Of. Peru		14	54	
	Exploration Of. Chile		14	39	
	Exploration Finance				
	TOTAL WORKFORCE	5,588	1,591	10,916	402

Note: Unionised Personnel, Non-unionised Personnel, and Contractor Personnel refers to the closure as of December 31st; Construction personnel data was averaged for 2024. Construction personnel (402 individuals) is not personnel directly employed by Fresnillo, it is personnel employed by our Parent Company "Industrias Peñoles", and they provide services pursuant the relevant inter-company Services Agreement.



## 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 recognise 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.

## Supply Chains

Critical suppliers are those that provide us with goods and services that:

- i. have the greatest impact on operating costs,
- ii. could directly affect our processes through their quality,
- iii. are scarce or have a sole-source supplier, and
- iv. are subject to purchasing and/or import is restrictions.

For these critical suppliers, we have a monitoring and evaluation programme that assesses both business management, and key sustainability issues, including climate change, water management, human rights, community relations, and diversity, equity, and inclusion. These assessments, help us identify risks, evaluate sustainability maturity, and pinpoint strengths and areas for improvement within their organisational structure. Based on these insights, we select suppliers to participate in skill-building programmes.

It is also important to highlight that our mines undergo independent external audits to verify compliance with the Gold and Silver Responsible Sourcing Guidelines by the London Bullion Market Association (LBMA)—based on the OECD Due Diligence Guidance. This certification enables our Parent Company, Industrias Peñoles—which sells our processed products—to assure its clients and investors that its precious metals supply chain is conflict-free.

These internal and external audits include interviews and assessments to evaluate the measures taken to protect the human rights of indigenous peoples, management of community and environmental impacts, as well as of our ethics and integrity programmes to combat money laundering and prevent terrorism financing. Additionally, they assess key labour practices, including health, safety, and labour relations.





# POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

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 reviewed as needed to meet all regulatory requirements. They are approved by Fresnillo's 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 Website](#). Our workforce also receives ongoing training after initial onboarding and regular updates throughout their careers. Finally, we have an internal system where we publish all our policies and procedures, to make them available for all employees.

At our Company, adherence to our policy framework is imperative for everyone regardless of their hierarchical position. This also includes associated external entities such as suppliers and customers. As part of this commitment, all third parties are required to fully comply with our Code of Ethics and Conduct for Third Parties as a mandatory condition of engagement.

The following table sets out our internal policies framework related to Modern Slavery:

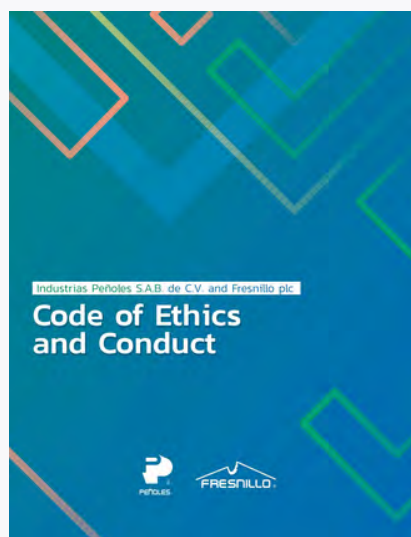
<p><u>Code of Ethics and Conduct</u></p>	<p>Applies to all our unionised and non-unionised personnel, sets out our values and individual commitments to conduct business ethically and outlines the Company's human rights expectations. At Fresnillo plc we seek to:</p> <ul style="list-style-type: none"><li>• Demonstrate a well-established ethical culture through our behaviours and actions.</li><li>• Promote fair and decent labour practices.</li><li>• Ensure that the workplace is free from all forms of labour and sexual discrimination, bullying and harassment, as well as any retaliation.</li><li>• Respect all rights to freedom of speech, association and collective bargaining.</li><li>• Prohibit child and forced labour in our operations and in our supply chain.</li><li>• Respect and encourage the diversity and inclusion of all people.</li><li>• Promote equal opportunities for men and women and prohibit gender-based bias or violence.</li><li>• Promote our practices with contractors and suppliers.</li></ul>
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<b><u>Code of Ethics and Conduct for Third Parties</u></b>	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 supply 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 the 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.
<b><u>Sustainability Policy</u></b>	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.
<b><u>Third Party Due Diligence Policy</u></b>	Sets out our commitment and procedures to diligently manage third party risks, including risks of bribery, corruption, money laundering, fraud, and human and labour rights violations, including Modern Slavery.
<b><u>Integrity Policy</u></b>	Establishes prevention, compliance, oversight and accountability mechanisms for avoiding 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.
<b><u>Antibribery and Anticorruption Policy</u></b>	Demonstrates our strict zero tolerance commitment towards Bribery and Corruption. The ethical behaviour of our personnel and third parties is the foundation of our compliance and human rights due diligence efforts. Thus, we strive to maintain a well-established ethical culture, demonstrated by our behaviour and actions. 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 of our Company.
<b><u>Anti-retaliation Policy[*]</u></b>	Establishes that the Company does not tolerate any type of retaliatory action against persons who report, in good faith, violations to our Code of Ethics and Conduct and policies through any of our reporting mechanisms (including but not limited to our whistleblowing line). We consider retaliation as any form of harassment, intimidation, threats, discrimination and/or coercion. If anyone becomes aware of any violations of our Code of Ethics and Conduct, including instances of retaliation, or breaches of our internal or external regulations, we strongly encourage to promptly report such incidents through the following link: <a href="https://fresnilloplc.lineacorrecta.com/en/index.html">https://fresnilloplc.lineacorrecta.com/en/index.html</a>

[\*]Note: These policies are not publicly available, but they are published in our internal web portal.

<b>Harassment Prevention Protocol [*]</b>	<p>Establishes the principles and guidelines through which accessible, efficient, reliable, and fair mechanisms operate to address, sanction, remedy, and eradicate cases of Sexual and Labour Harassment or Violence; promoting a safe, respectful workplace free from all forms of violence, creating workspaces that promote gender equality and foster a culture of respect for the dignity of all individuals and human rights of staff, with zero tolerance towards any form of harassment. The protocol is based on the general guidelines established by the Ministry of Labour and Social Welfare and Convention 190 issued by the International Labour Organisation.</p>
<b>Labour Equality and Non-discrimination Policy [*]</b>	<p>Aims to foster of a culture of respect for human dignity, establishing organisational 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.</p>
<b>Psychosocial risk prevention Policy [*]</b>	<p>Establishes the guidelines and principles to carry out the actions that allow us to identify, analyse and prevent psychosocial risk factors and workplace violence; as well as, to promote a favourable organisational environment in the workplace.</p>
<b>Human resources policies and procedures [*]</b>	<p>Our Human Resources framework encompasses a comprehensive set of policies and procedures covering various aspects, including, recruitment processes, succession planning, career development, and employees' benefits, incentives and compensation. Notably, we ensure that no potential worker is required to pay for employment, as all recruitment-related costs are fully covered by Fresnillo.</p>

[\*]Note: These policies are not publicly available, but they are published in our internal web portal.



## Our policy framework impact and updates:

Third-Party Code of Ethics and Conduct: Following a comprehensive review of our Third-Party Code of Ethics and Conduct, we issued an updated version in 2024 outlining the guidelines to which our business partners must adhere. It clearly states that all partners must commit to safeguard their employees' human and labour rights, treating everyone with respect and in a way that preserves their dignity and does not discriminate or violate their basic human rights and freedoms.

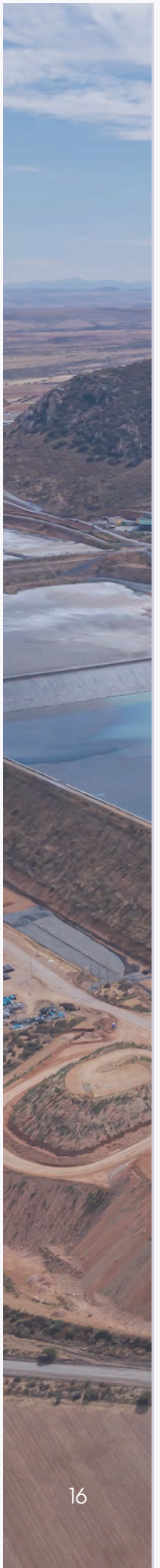
Bribery and corruption: Preventing bribery and corruption is fundamental to ensuring high ethical standards that are not complicit with labour and human right abuses. One way in which corruption affects labour rights in Mexico and could lead to Modern Slavery is through practices of evasion of social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

Harassment Prevention Programme: The Harassment Prevention Programme serves as a cornerstone for fostering a 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. We believe that a positive work environment not only contributes to overall wellbeing but also significantly influences productivity. We strongly believe that a culture that prevents harassment also protects against Modern Slavery practices.

Procedure of Suppliers' Evaluation: During 2024, we documented an internal procedure of suppliers' evaluation and during 2025 we will replicate this effort for contractors' evaluation. The evaluation of our suppliers and contractors encompasses not only their operational performance, but also, other ESG metrics including their commitment to reject practices that harm the human and labour rights of their personnel, which covers Modern Slavery.

## Responsible Departments of Modern Slavery Policies

Our Compliance and Human Resources departments are responsible for the implementation of our policies regarding the prevention of Modern Slavery. Any breach or violation of our regulations can be reported through the whistleblowing line or to the Compliance Department which handles and responds to these concerns, and disciplinary measures would be carried out as appropriate. Also, our Internal Audit reviews compliance with policies and procedures in our different processes according to the audit plan.





# RISK ASSESSMENTS, PREVENTION AND MITIGATION

## Risk Management Framework

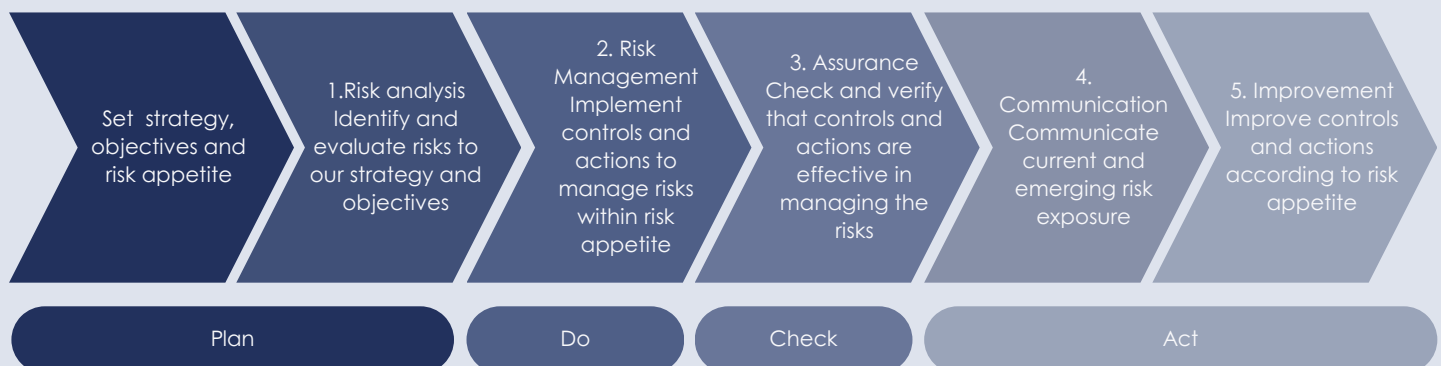
As Modern Slavery remains a potential risk in our industry and region, it is essential to outline how we identify, assess and mitigate risks across our operations.

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. Finally, our risk management framework reflects the importance of risk awareness across our Company. It enables us to identify, assess, prioritise and manage risks to deliver the value creation objectives defined in our business model.



## 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.





# Risk Management Framework

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 depicted in the following table and more broadly explained in our latest Annual Report [here](#) [117-118].



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



# Modern Slavery Risk assessment

In 2024, we conducted a risk assessment to identify and evaluate current and potential risks related to human rights, including Modern Slavery, and the controls in place to mitigate these risks.

Our approach to assessing the risks of Modern Slavery consists primarily of the following:

- Mapping our supply chain to identify the country of origin of our main suppliers and contractors, and the associated risk.
- Understanding Mexico's global exposure based on the Global Slavery Index<sup>7</sup>.
- Understanding the human rights risks in the countries where our main suppliers and contractors are located.
- Evaluating the identified risks considering their likelihood and impact, as well as the controls implemented to mitigate the risk.
- Reviewing the actions and controls in place within the company to prevent, reduce and/or mitigate the risk.

With this assessment we determined where our main risk exposure exists globally, with a focus on Mexico due to being the geography where our operations, projects and supply chain are located. We consider the type of labour employed throughout our supply chain and the contractual agreements used in Mexico. Also, we use our own analysis to identify potential risks in the communities in which we operate.

## Identifying the risks

Modern Slavery risks are global; they can arise due to the social and political context in the region or country where we operate and source, the nature of the goods and services we acquire, as well as the entities or communities with which we interact. Therefore, our Modern Slavery risk profile is continually evolving.

When identifying and understanding our Modern Slavery risks, whether in our operations or in our supply chains, we rely on the United Nations Guiding Principles on Business and Human Rights, which consider that a company may be involved in an adverse impact on human rights under the following assumptions:

- Causing it directly through its own actions or omissions.
- Contributing to it through its own actions or omissions or through a third party.
- Being directly linked to it through its commercial relationships derived from its products, services or operations.

Considering the data presented by the International Labour Organisation for the year 2024 (including the ILOs 11 indicators of forced labour) and the Global Slavery Index 2023, in Mexico there are high risk factors in terms of human rights and Modern Slavery. At our Company, we are particularly concerned about the risks in the supply chains of goods and services with the suppliers and contractors of our suppliers and contractors; that is, in the second or third line of supply.

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<sup>7</sup>Latest available <https://www.walkfree.org/global-slavery-index/>

## Risks in our supply chains

We recognise the risk of Modern Slavery in our supply chains that supply our operations and projects, including relationships with direct suppliers (tier 1), and, with their suppliers (tier 2 or 3).

We adopt a comprehensive approach when assessing the risks in our supply chains, considering a combination of the risk profiles of supplier companies (codes of conduct, policies, procedures, reporting lines, etc.) and their operational management at our facilities.

Considering the sales volume for the year 2023 and the first half of 2024, as well as the criticality of the goods and services in connection with our operations and projects, we selected the 50 most relevant suppliers and/or contractors in order to carry out the Modern Slavery risk assessment; subsequently, we raised their awareness of this exercise and requested the following information:

- 1.Their commitment to respect human rights in accordance with the United Nations Guiding Principles.
- 2.Policies and procedures implemented to prevent and/or avoid Modern Slavery.
- 3.Evidence of the application and communication of these policies to workers.
- 4.Evidence of due diligence in human rights matters of their own suppliers.
- 5.Training provided to their staff on human rights matters.
- 6.Effectiveness of their reporting mechanisms.

These six aspects above helped us to establish the Risk Profile Indicator of our suppliers and/or contractors.

In Mexico, we consider the following risk indicators:

- The government's response to Modern Slavery (e.g. whether there are strong regulations and laws and support for victims).
- The vulnerability of individuals to Modern Slavery (e.g. high rates of inequality, poverty and/or marginalised groups, lack of rights, poor or reduced health protection, absence of protection for the most vulnerable).
- Conflict or risk of social conflict.
- Undocumented migration.
- Direct latent threats to slavery (e.g. drug trafficking or organised crime, human trafficking, etc.)

To perform this assessment, we also consider the following risk indicators:

- Work that is performed out of sight or in remote locations.
- Work that is temporary, seasonal or contractual in nature.
- Work that is gender-based, and how women and girls may experience discrimination.
- Work that is often performed by migrant workers who may speak a different language or be culturally separated.
- Where there are few barriers to entry (minimum qualifications, education or experience required).
- Work performed that may be considered dangerous, demeaning or degrading.
- Workers that are recruited by third-party employment agencies, with unclear recruitment practices.

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<sup>7</sup>Latest available <https://www.walkfree.org/global-slavery-index/>

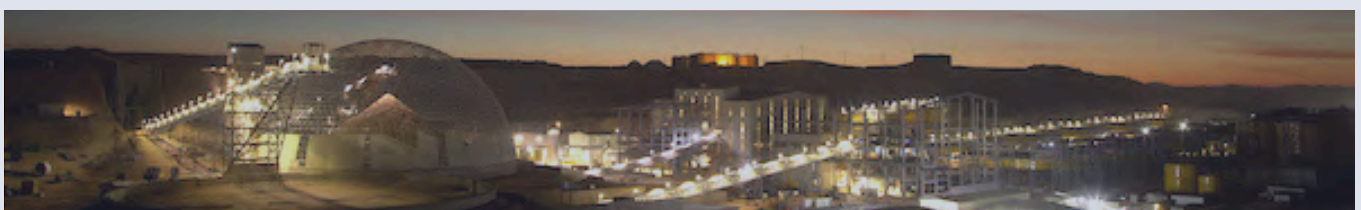




### Results of the risk assessment

As a result of the analysis of the information collected from the three risk profiles: a) country risk; b) Company risk (Fresnillo plc), and c) supply chain risk, as well as derived from the interviews and investigations that were carried out within the framework of the 2024 Modern Slavery risk assessment, the following is concluded:

- Mexico, as a country, presents a very high risk of Modern Slavery. There is sufficient evidence that points to serious cases of human trafficking, child labour, and forced labour. According to the Global Slavery Index 2023, seven out of every 1,000 people live in conditions of Modern Slavery in Mexico. Mass migration fuels forced labour, particularly in the migration corridor of Chiapas, Oaxaca, Guerrero and the entire Pacific Ocean coast up to the border of Mexico with the United States.
- At Fresnillo, we have Policies & Guidelines that reduce the risk of Modern Slavery. The Human Resources and Compliance teams maintain specific procedures to identify these types of cases and/or prevent them from occurring; at the same time, they monitor, through different communication mechanisms with access to all staff and even suppliers and contractors, reports and complaints of cases of mistreatment or forced labour, harassment, etc. Complaints registered in 2023 and 2024 are within acceptable standards for companies of this size. Additionally, there is a Code of Ethics and Conduct that defines the framework of values and principles that regulate the actions of employees, which is promoted with training and awareness workshops. Therefore, the risk of Modern Slavery is low.
- Regarding our supply chain of inputs and services, it is concluded that the risk is low in the first line of contracting; that is, with the suppliers and contractors that are directly available. However, in the following “tiers” of contracting, that is, with suppliers or contractors of Fresnillo plc's suppliers or contractors, the risk elevates to a medium level, because we do not have direct access to information or contact beyond tier 1. However, according to our Third-Party Code of Ethics and Conduct, we require our supply chain to ensure their respective suppliers keep the same standards.



<sup>7</sup>Latest available <https://www.walkfree.org/global-slavery-index/>



# DUE DILIGENCE PROCESS

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

Our suppliers and contractors 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 engaging in business with a third party, we conduct a due diligence assessment of their ethical profile, to determine the level of risk and the corresponding measures. This 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.

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 authorisations, and enhancing audit rights, based on encountered risks.

Our due diligence process is automated and optimised with the use of a software tool. It considers 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.

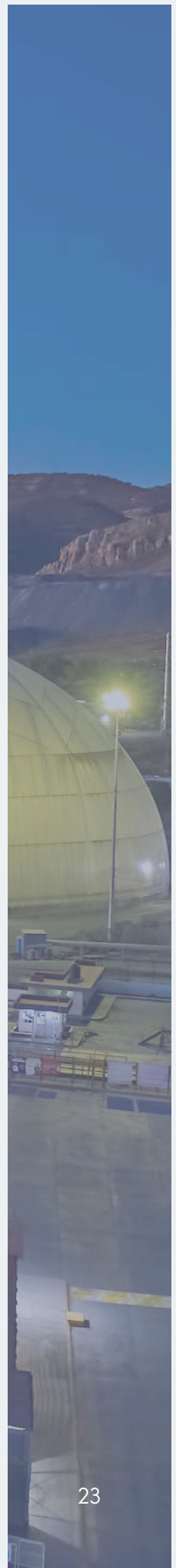


As part of this due diligence process, we review an overall status of our contractors regarding their compliance with their legal labour obligations (i.e. compliance status with the Mexican Social Security Institute - IMSS, by its acronym in Spanish). In line with this, we monitor our contractors to confirm that they properly enrol their employees with the Mexican Social Security Institute (IMSS) and other social security entities, thereby ensuring that social security fees of their employees are covered, and, in consequence, benefits are made available. In addition, we monitor compliance of their obligations to the healthcare and pension funds of their employees, which includes contributions to their legal retirement plan.

Compliance with the registry at the IMSS contributes to the verification of the legal status of our employees and contractors to prevent the risk of human trafficking victims and child labour in our supply chain. Access is denied at our mining operations to third- party contractors who do not comply with their IMSS enrolment requirement. We also take measures to verify that our contractors comply with the safety and health regulations and standards provided by the Company.

Example 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?



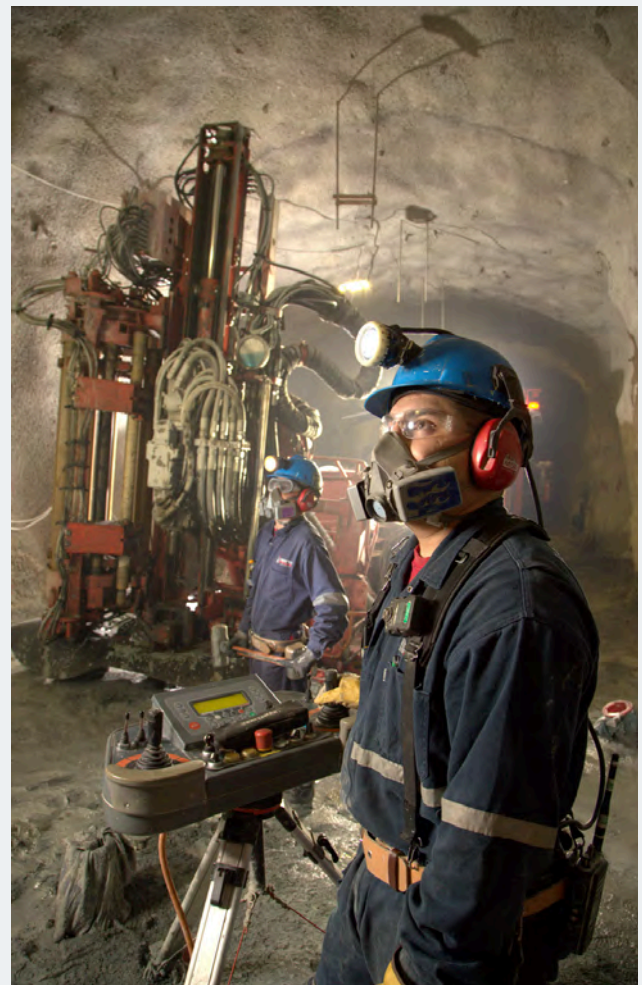
# Main Supplies

We purchase goods and services across all stages of the mining cycle, from exploration and construction to mining operations. Where possible, we buy local goods and services to develop procurement opportunities and economic development within the communities where we operate. This includes:

- Loaders, trucks and mining machinery
- Drilling and breaking machines
- Electrical components
- Vehicles
- Tools
- Explosives
- Diesel

## Procurement Team (individuals):

	Procurement	Contract management
Corporate	32	10
Local (in the business units)	14	8
<b>TOTAL</b>	<b>46</b>	<b>18</b>





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 <sup>8</sup>	Government Response Rating <sup>9</sup>	Estimated proportion living in modern slavery <sup>10</sup>	Vulnerability to Modern Slavery <sup>11</sup>
Mexico	95%	64	55/100	6.6 / 1000	58/100
USA	1.6%	122	67/100	3.3 / 1000	25/100
United Kingdom	1.4%	145	68/100	1.8 / 1000	14/100
Sweden	0.6%	156	63/100	0.6 / 1000	7/100
Others	1.4%	Not applicable	Not applicable	Not applicable	Not applicable

Note: Related parties of Fresnillo plc are not considered in the figures above.

## Key Controls

- Our contracts provide clauses that prohibit conducts that constitute Modern Slavery. Also, our contracts set forth the right for the Company to carry on audits to ensure that third parties comply with their obligations regarding Modern Slavery and the respect of human and labour rights. Our third parties must provide us the 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 our request. If we identify that a third party does not comply with such obligations, we are entitled to terminate the commercial relationship with the third party in question.
- Disciplinary measures for individuals involved directly or indirectly in Modern Slavery, including third parties, may range from legal measures to the termination of their employment contract, in the case of members of our workforce, or termination of business relationships in the case of third parties.



<sup>8</sup>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.

<sup>9</sup>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.

<sup>10</sup>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.

<sup>11</sup>The vulnerability model estimates how vulnerable people in a country are to Modern Slavery and in what ways.

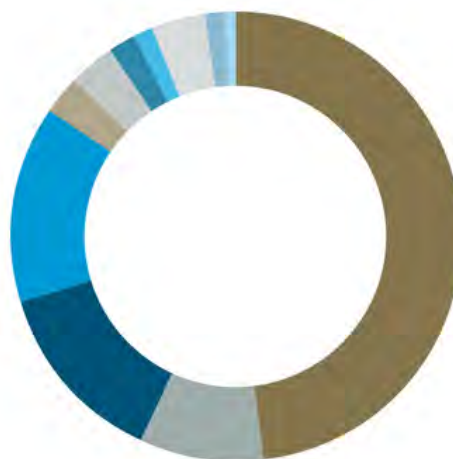
# EFFECTIVENESS MEASURED AGAINST APPROPRIATE KEY PERFORMANCE INDICATORS

## 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, covering Modern Slavery**. 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.

No Modern Slavery complaints were received in 2024 through our whistleblowing line; however, we received 85 alleged harassment cases (of 161 reports received to our whistleblowing line).

Cases by classification



Type	2024	2023
Labour harassment	72	66
Sexual harassment	13	23
Inappropriate arrangements with suppliers	20	21
Abuse of authority	21	19
Other	12	11
Non-compliance with internal policy	4	8
Conflict of interest	5	5
Professional negligence	3	5
Unsafe conditions	2	4
Fraud	6	1
Misuse of assets	2	–
Breach of trust	1	–
Inappropriate behaviour at work	0	–
<b>Total</b>	<b>161</b>	<b>163</b>

## Ethical Conduct KPIs:



## Community Grievance Mechanism

We also maintain a Community Grievance Mechanism that is responsible for receiving, evaluating, investigating and responding to complaints and claims from communities. This mechanism keeps a strong track record of transparent engagement with our stakeholders to address any genuine concerns. Our grievance mechanism contributes to a fair and effective resolution process to respond to concerns and resolve disputes. Each operating unit and 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. No Modern Slavery complaints were received in 2024 through our community grievance mechanism.

The table below presents the figures of grievance statistics:

Grievance statistics		2024	2023	2022	2021
Outstanding grievances from previous periods	Number	6	10	11	14
New grievances received in the period	Number	19	21	11	22
Total grievances	Number	25	31	22	36
Closed grievances in the period	Number	18	25	12	25
Outstanding grievances at the end of the period	Number	7	6	10	11

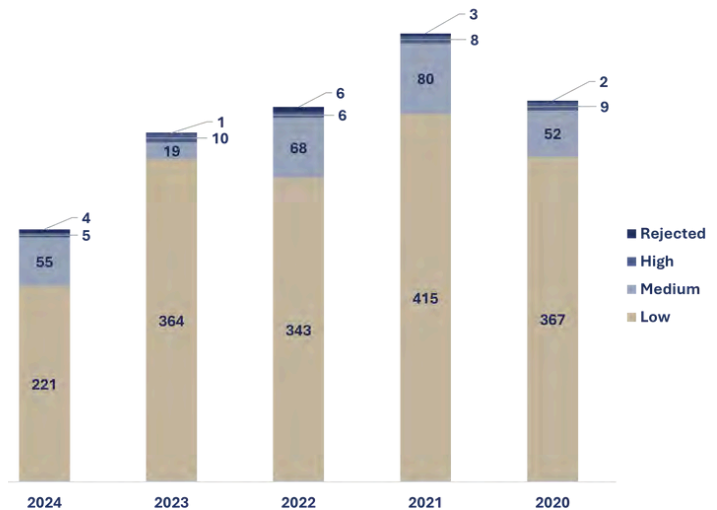


## Due diligences performed

In 2024, a total of 285 third-party due diligence requests were performed. As a result of the analysis, Compliance personnel assigned the following risk levels: low, medium, high, and rejected.

In the chart below you can see the due diligences results of 2024 compared to previous years. 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, which contributes to prevent child labour, human trafficking, and healthcare access.

**Third-party due diligences performed, by risk level**



# TRAINING AND CAPACITY BUILDING

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 associated third parties to consistently embody and adhere to these standards, as well as to our Code of Ethics and Conduct.

## Raising Awareness

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

Training	Stakeholders reached	Objective
<b>Code of Ethics and Conduct</b>	1,547 non-unionised employees (96% 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
<b>Integrity and regulatory compliance training</b>	45 Engineers in Training	Integrity-related onboarding workshop for new generations of the trainees' programme.
<b>Key integrity and compliance matters</b>	Key areas within business units in the Fresnillo District (88 people)	Face to face workshops focused on: Regulatory compliance, Conflicts of Interest, and Harassment Prevention.



Labour and Sexual Harassment workshops for new personnel, unionised and non-unionised employees, as well as contractors during 2024 by business unit:

Business unit	Stakeholders reached
Ciénega	132
San Julián	223
Fresnillo	79
Saucito	72
Juanicipio	47
Corporate	10
Herradura	31
Exploration	82
<b>Total</b>	<b>676</b>

These workshops cover 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.

In 2024, we updated the workplace and sexual harassment protocol, integrating improvements to enhance efficiency, objectivity, and confidentiality in the reporting and response process.



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.

These 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.





# 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 practices for our non-unionised employees.

## Risk management

- Continue developing risk assessments for Modern Slavery risks in our workforce and supply chain.
- Review our actions to prevent Modern Slavery compared to best practices to develop targeted improvement strategies to mitigate this risk.
- Development of a new internal procedure to evaluate contractors including human rights and Modern Slavery criteria.
- Preparation of systems to execute the evaluation of both supplier and contractors



The Board and its HSECR (Health, Safety, Environment and Community Relations) Committee will continue to review these issues and remain absolutely committed to preventing Modern Slavery practices in whatever shape or form.

Yours faithfully,



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Arturo Fernández,

**This statement has been signed by Arturo Fernandez, a Fresnillo plc Non-Executive (NED) Board Director and Chairman of the HSECR Committee, on 24 April 2025.**

**This statement is made pursuant to the U.K. Modern Slavery Act of 2015. On formal Board meeting of 24 April 2025, the Board of Directors of Fresnillo plc discussed and approved this statement. This statement covers the year 2024, from January 1st to December 31st.**

For more information, please visit the Company's latest Annual Report [here](#) and our website [here](#).