

## MODERN SLAVERY STATEMENT, FOR THE FISCAL YEAR ENDING DECEMBER 31, 2021

*Modern slavery is a hidden crime that affects every country in the world and has been found in many industries and in many contexts. From poverty to gender discrimination and inequality, addressing risk factors is fundamental to combating and preventing modern slavery.*

*As a business operating in multiple jurisdictions and sourcing a diverse range of goods and services from suppliers worldwide, Centamin recognises its responsibility to address and eliminate this crime where it occurs.*

*This Modern Slavery Statement describes the steps taken by Centamin during the 2021 financial year to ensure that slavery and human trafficking is not taking place in our supply chain and in any part of our own business. Our progress over the last year has focused on strengthening our policy and governance frameworks and supply chain due diligence activities.*

*We recognise that our review and assessment of our actions to identify and address our modern slavery risks in our operations and across our supply chain will be an ongoing and evolving process that we are committed to continue to build upon. In particular, we recognise the need for more collaboration between business partners and across sectors and stakeholder groups. To this end, we set ourselves annual goals to reach so we can look back and assess the effectiveness of our approach and inform our path forward.*

**Martin Horgan CEO**

### 1 INTRODUCTION

Modern slavery<sup>1</sup> is the term used to describe forced labour, debt bondage, forced marriage, slavery and slavery-like practices, and human trafficking. Essentially, it refers to situations of exploitation that a person cannot refuse or leave because of threats, violence, coercion, deception, and/or abuse of power.

This Statement is made by Centamin plc (“Centamin” or the “Group”) and constitutes our Modern Slavery Statement in response to Section 54 of the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 (Cth)<sup>2</sup>, for the period 1 January 2021 to 31 December 2021. This is a joint statement on behalf of the following entities for the reporting period:

- Centamin plc (Company No: 109180), the Group’s parent company registered in Jersey
- Centamin Egypt Limited (ABN: 86 007 700 352), a registered business in Australia which holds a 100% interest in Pharoah Gold Mines Limited
- Pharoah Gold Mines NL (ABN: 13 062 135 728), a registered business in Australia which holds a 50% interest in the Sukari Gold Mine in Egypt
- Ampella Mining Limited (ABN: 59 121 152 001), a registered business in Australia which is dormant.

The Statement describes the steps taken by Centamin to assess and address modern slavery risks in our business and supply chain. We recognise our legal duty to drive out poor labour practices where they may exist, and moral duty to influence and incentivise continuous improvements in supply chains.

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<sup>1</sup> <https://www.walkfree.org/what-is-modern-slavery/>

<sup>2</sup> The form and content of this Statement also aims to conform to the requirements of the Australian Modern Slavery Act 2018, where this may be applicable to Centamin.

In demonstration of our commitment to continuous improvement, priority actions for 2022 to address the risk of modern slavery in our business and supply chain are presented throughout this Statement in text boxes.

This Statement was approved by Centamin's Board of Directors on 13 July 2022 on behalf of itself and the other reporting entities listed above and has been signed by the Chief Executive Officer.

## 2 HIGHLIGHTS

Key actions undertaken in 2021 to assess and address modern slavery risks are summarised in Table 1 and detailed in Section 4.

**Table 1 – Performance highlights for 2021**

Highlights	Scope
Updated Group Human Rights Policy	Group
No human rights impacts nor incidents were recorded through grievance mechanisms	Group
Roll-out across the Group of our new standard terms and conditions of contract for suppliers, including Supplier Code of Conduct	Group
Preliminary human rights assessment complete at Sukari using the UN Guiding Principles on Business and Human Rights reporting framework	Sukari
All existing suppliers at Sukari requested to acknowledge their commitment to the Supplier Code of Conduct	Sukari
Preliminary ESG risk screening complete for 22% of all suppliers at Sukari	Sukari
40% of existing suppliers at Sukari requested to complete self-assessment ESG due diligence questionnaire	Sukari

## 3 OUR STRUCTURE, OPERATIONS AND SUPPLY CHAINS

### 3.1 Our Business Structure and Assets

Centamin is a gold exploration, development and mining company dual listed on the London Stock Exchange and the Toronto Stock Exchange. It is incorporated in the island of Jersey and comprises 27 subsidiary entities providing corporate technical services (in Jersey, UK and Australia) and exploration, development and mining activity (in Egypt and West Africa).

Centamin's principal asset, the Sukari Gold Mine ("Sukari") in Egypt, is operated by the Sukari Gold Mining Company, a joint stock company established under the laws of Egypt, which is owned 50% by Pharaoh Gold Mines NL, a wholly owned subsidiary of Centamin, and 50% by the Egyptian Mineral Resource Authority. Our portfolio in West Africa encompasses greenfield exploration properties in Côte d'Ivoire and Burkina Faso.

All gold produced by Centamin is sourced from our own mining operations at Sukari. We do not purchase gold from artisanal or small-scale miners. The gold, in the form of doré bars, is refined into bullion by Asahi Refining ("Asahi") at their Canada-based refinery. Asahi is a certified member of the

London Bullion Market Association (“LBMA”) and the Responsible Jewellery Council. Once refined, the gold is sold by Asahi to one or more market participants who take responsibility for its onward distribution to industry users, predominantly in the investment, jewellery, electronics and medical equipment sectors.

**Table 1 – Our Assets and Ownership**

Asset	Location	Ownership
<b>Sukari Gold Mine, operating gold mine</b>	Red Sea, Egypt	50%
<b>Doropo, advanced gold exploration project</b>	Boukani region, Côte d’Ivoire	100%
<b>ABC, greenfield gold exploration project</b>	Kabadougou and Bafing regions, Côte d’Ivoire	100%
<b>Konkera, advanced gold exploration project</b>	Noumbiel region, Burkina Faso	90%

Our assets and modern slavery risks identified by the Global Slavery Index are summarised in Table 2.

**Table 2 – Global Slavery Index for Centamin assets**

Asset	Country	Prevalence Index Rank <sup>3</sup>	Government Response Index <sup>4</sup>
Sukari Gold Mine	Egypt	63	B
Doropo, ABC exploration projects	Côte d’Ivoire	56	B
Konkera exploration project	Burkina Faso	76	CCC

### 3.2 Governance and Organisational Structure

At Centamin we understand that our commitment to responsible business practices is fundamental to our success and ability to be a trusted partner to our stakeholders. Centamin’s corporate governance structure provides robust oversight and management accountability on all material aspects of the business, including sustainability performance.

The Board of Directors of Centamin have ultimate responsibility for the implementation and management of Centamin’s policies, including this Modern Slavery Statement. The Board is supported by a dedicated Sustainability Committee which oversees the development and implementation of the company’s sustainability goals, policies and standards on matters of social responsibility and human rights; environmental responsibility; workplace health, safety and labour rights. The committee serves as Board advisory on matters including good industry practice, sustainability performance, compliance and licence to operate risk. Charters define the role and responsibility of the Board and each committee within the Company’s corporate governance framework and are published on the Centamin website: <https://www.centamin.com/about/governance/>.

<sup>3</sup> <https://www.globallslaveryindex.org/2018/data/maps/#prevalence>, average prevalence of modern slavery at the country level (the lower the number the more prevalent the risk)

<sup>4</sup> <https://www.globallslaveryindex.org/2018/methodology/government-response/>, assessment of the actions governments are taking to respond to modern slavery

The remit of the Sustainability Committee includes the review of Centamin’s practices in relation to the Modern Slavery Act and appropriate steps towards minimising, mitigating and ultimately eliminating exposure to modern slavery across its business activities.

The Board also has overall responsibility for the review of existing principal and emerging risks to the long-term viability of the business, supported by the Audit and Risk Committee. The Board continuously monitor and refine the risk management framework to meet the changing requirements of the business. Our approach to risk management and the results of our risk review are presented in pages 58 to 75 of the 2021 Annual Report: <https://www.centamin.com/media/2529/cent-ar21-full-web-secure.pdf>

The Chief Executive Officer (“CEO”) has overall responsibility for Centamin’s sustainability performance. Reporting to the CEO is the Head of Environmental and Social Governance, who leads the Group Sustainability Team and has primary responsibility for the implementation of Centamin’s Sustainability Performance Framework. The sustainability team provides guidance to asset-level managers in operationalising the Framework and its integration into asset-level management systems and practice. Our asset-level managers are supported in this responsibility by dedicated in-country health, safety, environmental and social (“HSES”) specialists familiar with the local regulatory context, values and cultural sensitivities.

### 3.3 Our Policy Framework

Centamin’s commitment to responsible mining is set out in a series of policies available on our website (<https://www.centamin.com/about/governance/>) including: Human Rights, Code of Conduct, Our People, Diversity and Inclusion, Social Responsibility, Anti-corruption and Bribery and Whistleblower Hotline.

The policies detail Centamin’s core business principles and commitments that are integral to the Company’s business strategy and underpin sustainability performance. This policy framework applies to all Centamin activities and representatives, including without limitation: directors, employees and any third-party workers, business partners or visitors of Centamin’s controlled and managed assets; and all sites, all business activities, and all phases of the mine life-cycle encompassing exploration, design, construction, operations, and closure. The policies also provide clear alignment to recognised industry standards, not limited to the World Gold Council Responsible Gold Mining Principles<sup>5</sup> (“RGMPs”).

Our Human Rights Policy<sup>6</sup> which includes our commitment to adopt and implement policies, practices and systems based on the UN Guiding Principles on Business and Human Rights (“UNGP”); World Gold Council’s conflict-free gold standard; and the Voluntary Principles on Security and Human Rights. The policy outlines our management approach to protecting the rights of our stakeholders to not cause, or be complicit, in any instances of human rights abuses directly or through our business relationships. It expressly opposes all forms of slavery, forced or compulsory labour and child labour, both within our organisation and our supply chain.

Our human resource management system comprises a comprehensive suite of policies and procedures that cover recruitment, employment, leave, remuneration, training and development, termination and disciplinary action. The principles and commitments detailed in these policies and procedures are aligned with good industry practice, the standards of the International Labour Organisation and human rights frameworks, specifically: freedom of association and recognition of the right to collective bargaining; the elimination of all forms of forced or compulsory labour; the effective abolition of child labour; elimination of discrimination in respect of employment; and safe and healthy working environment.

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<sup>5</sup> <https://www.gold.org/industry-standards/responsible-gold-mining>

<sup>6</sup> [https://www.centamin.com/media/2451/cey-human-rights-policy-2021\\_en.pdf](https://www.centamin.com/media/2451/cey-human-rights-policy-2021_en.pdf)

We are committed to using only those suppliers that adhere to the same fundamental principles as our own relating to legal compliance, fairness, honesty and anti-corruption. As a condition of doing business with Centamin, our suppliers are required to comply with applicable laws and meet the commitments and obligations under our company policy framework, including: human rights, anti-bribery and corruption, health, safety, environment and social responsibility. They also commit to maintain policies and procedures relating to the prevention of human rights violations. These requirements are stated in our standard terms and conditions of contract to which is annexed the Supplier Code of Conduct which details our expectations.

### 3.4 Our People

Our Company purpose is to create opportunity for people through responsible mining. Centamin’s Code of Conduct and People Policy affirms our commitment to uphold high moral and ethical principles and specifies the basic norms of behaviour for employees and others conducting business on our behalf. This is supplemented by the following policies that outline our commitment to basic human rights and freedoms: Human Rights; Diversity; Anti-corruption and Bribery; and Whistleblower.

As of 31 December 2021, Centamin had 2,329 employees of which 1,847 persons (equivalent to 79%) work in Egypt, 19% in Côte d’Ivoire, and the remaining in Burkina Faso and corporate officing (Jersey, UK and Australia) – as presented in Figure 1. The majority of our employees are full-time and permanent with the exception of 450 temporary employees in Côte d’Ivoire.

An additional 2,059 contractors are engaged by Centamin to perform exploration and mining services of which 95% work in Egypt.

	TOTAL	HEAD OFFICE	EGYPT		CÔTE D’IVOIRE		BURKINA FASO	
			Expat	National	Expat	National	Expat	National
<b>Employees</b>								
Male	2,272	18	95	1,744	4	406	–	5
Female	57	6	–	8	0	43	–	–
<b>Total</b>	<b>2,329</b>	<b>24</b>	<b>95</b>	<b>1,752</b>	<b>4</b>	<b>449</b>	<b>0</b>	<b>5</b>
<b>Contractors</b>								
Male	2,049	–	119	1,827	13	78	–	12
Female	10	–	–	2	–	8	–	–
<b>Total</b>	<b>2,059</b>	<b>0</b>	<b>119</b>	<b>1,829</b>	<b>13</b>	<b>86</b>	<b>0</b>	<b>12</b>
<b>Total Combined Workforce</b>	<b>4,388</b>	<b>24</b>	<b>214</b>	<b>3,581</b>	<b>17</b>	<b>535</b>	<b>0</b>	<b>17</b>

**Figure 1 – Workforce demographic**

Our Code of Conduct seeks to ensure that employees and contractors working for Centamin conduct themselves in accordance with all applicable laws, rules and regulations and to the highest ethical standards.

We recognise and respect employees’ rights to freedom of association. While we do not place any restrictions or prescriptions on union representation, there is no such representation within our workforce and no collective bargaining agreements. We encourage employees to raise questions and concerns with their supervisor in our effort to maintain a workplace free from corruption, discrimination, harassment and retaliation. Our site-based grievance mechanism and independent Whistleblower Hotline allow workers to anonymously file a complaint. Furthermore, we prohibit any form of retaliation in relation to reports received through our grievance process or Whistleblower Hotline.

### 3.5 Our Supply Chain

Centamin procures a diverse range of goods and services from suppliers worldwide, including many local suppliers based within the countries of our assets. Our procurement is managed at an asset-level but overseen by a Group finance and administration function based in Jersey. The majority of our suppliers are engaged on agreed standard Centamin terms and conditions of contract.

Almost 99% of our procurement spend is at Sukari, where the main types of procurement by value are general consumables, fuel and oils, contractor services and reagents. Of the 850 direct suppliers at Sukari, the majority by number (59%) and by value (60%) are located in Egypt followed by Europe (23%) and Australia (7%) – as presented in Figure 2.

The principal goods and services sourced by Sukari nationally include: general consumables, contractor services, lubricants, fuel and oil. The principal goods and services sourced by Sukari internationally include: reagents (cyanide, flotation reagents); other consumables (forged grinding media, explosives and accessories); Original Equipment Manufacturer plant and spares (power generation, other fixed and mobile equipment); communications hardware and software.

At corporate-level, our direct suppliers provide professional services including technical specialists, legal, insurance, financial advice and IT.

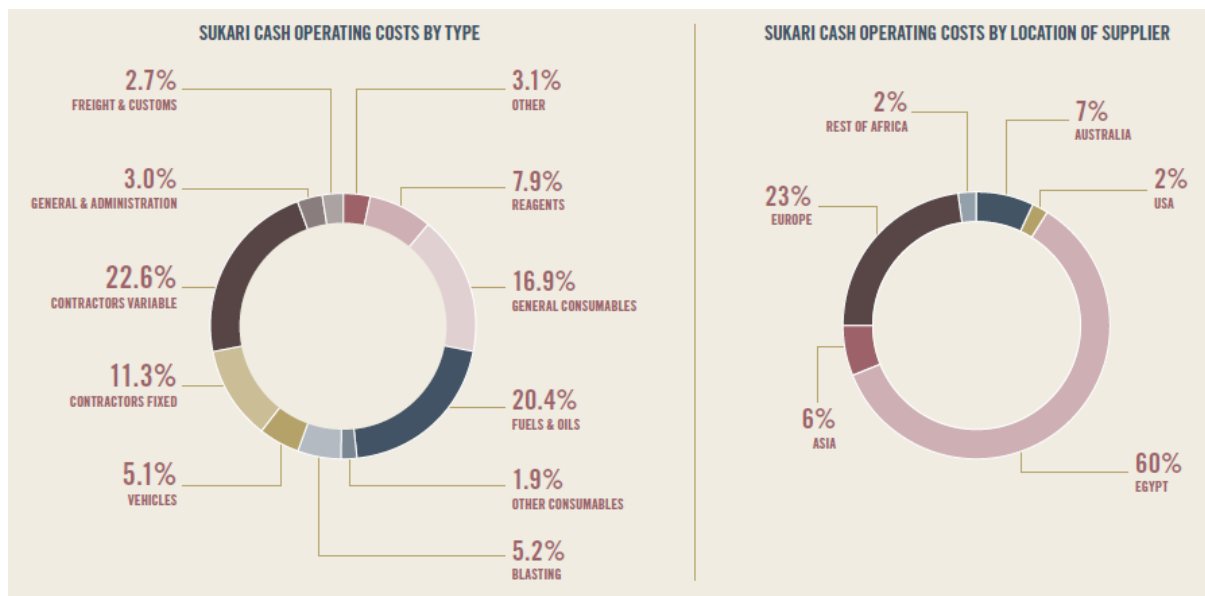


Figure 2 – Sukari cash operating costs by type and supplier location

## 4 ACTIONS TAKEN TO ASSESS AND ADDRESS OUR MODERN SLAVERY RISKS

Actions taken in 2021 to assess and address our modern slavery risks are outlined below. These actions are considered in terms of (i) our direct operational activities; and (ii) our supply chain.

The approach to the management of modern slavery risks is underpinned by our risk management framework as presented on the Centamin website<sup>7</sup>. This prioritises risk mitigation where this has potential impact on our direct operational activities and secondly within our direct supply chain. We

<sup>7</sup> <https://www.centamin.com/about/risk-opportunity-management/>

acknowledge that our actions within the reporting period are likely to have limited influence or control on risks that extend beyond our direct suppliers, due to the long and complex nature of the upstream supply chain.

In demonstration of our commitment to continuous improvement, forward-looking actions for 2022 to further mitigate modern slavery risks in our business and supply chain are highlighted.

#### 4.1 Direct Operational Activities

Our governance and policy framework as described in Sections 3.2 and 3.3 of this Statement, broadly mitigates our risk of involvement in modern slavery through our direct operational activities. We acknowledge however the human rights risks associated with employment of personnel and our duty of care as an employer to safeguard these human rights.

In the reporting period we have reinforced our efforts to assess and address modern slavery risks in the following areas.

##### 4.1.1 Group Policy Amendments

In 2021 we updated and refreshed the ESG policies that underpin our Sustainability Performance Framework to reinforce alignment with our values, our evolving business and international good practice. This included updates to our existing Human Rights Policy and introduction of a new People Policy.

As noted in Section 3.2, our Human Rights Policy outlines our management approach to protecting the rights of our stakeholders to not cause, or be complicit, in any instances of human rights abuses directly or through our business relationships. It expressly opposes all forms of slavery, forced or compulsory labour and child labour, both within our organisation and our supply chain. The policy is signed by the Chief Executive Officer and endorsed by the Board.

*Priority actions in 2022:*

- *Update to our existing Code of Conduct and Diversity and Inclusion Policy.*

##### 4.1.2 Human Rights Risk Assessment

In 2021, we assessed our most significant or salient human rights issues of relevance to our business using the United Nations Guiding Principles (“UNGPs”) reporting framework and the adequacy of our management measures for responding to these risks.

At the current time, the most salient human rights issues relate to occupational health and safety, favourable work conditions and rights of non-discrimination in employment. These issues are listed in Table 3, including the key activities undertaken in 2021 to address each.

**Table 3 – Salient human rights issues at Sukari**

Salient Human Right Issues	Activities in 2021
Right to health	Updated Safety, Health & Wellbeing Policy



Salient Human Right Issues	Activities in 2021
	<p>Continuous improvement in health and safety management systems and practice within our workplace</p> <p>Initiated development of a mental wellbeing program at Sukari</p> <p>Implementation of a non-communicable health awareness surveillance program at Sukari</p>
<p><b>Right to Life – occupational safety</b></p>	<p>Updated Safety, Health &amp; Wellbeing Policy</p> <p>Continuous improvement in health and safety management systems and practice within our workplace</p> <p>Independent Review of Health &amp; Safety Performance</p> <p>Introduction of revised standard terms and conditions of contract for new suppliers at group-level with clear reference to human rights standards</p>
<p><b>Right to favourable conditions of work</b></p>	<p>Introduction of a new remuneration system, based on revised position and salary benchmarking at Sukari</p> <p>Upgrade of accommodation, recreational facilities and catering facilities at Sukari</p> <p>Continuous improvement in health and safety management systems and practice within our workplace</p> <p>Introduction of revised standard terms and conditions of contract for new suppliers at group-level with clear reference to human rights standards</p> <p>Reinforced levels of human rights due diligence within our supply chain including the introduction of ESG screening requirements into vendor onboarding at Sukari</p>
<p><b>Rights of non-discrimination in employment, and women’s rights in particular</b></p>	<p>Introduction of new People policy under which all persons are to be treated fairly and without the risk of discrimination</p> <p>Review of legal restrictions relating to the participation of women in the Egyptian mining sector. Systematic review of employment practises at Sukari and implementation of measures to resolve barriers to the advancement and fair treatment of women in the workplace.</p> <p>Reinforced levels of human rights due diligence within our supply chain including the introduction of ESG screening requirements into vendor onboarding at Sukari</p>
<p><b>Right not to be subjected to degrading treatment or punishment, and security practices in particular</b></p>	<p>Security personnel received training in the Voluntary Principles of Security and Human Rights at Sukari</p>
<p><b>Right to Freedom of Association</b></p>	<p>Introduction of new People policy recognising the legal rights of our workforce to freedom of association</p> <p>Establishment of a committee comprising elected representatives to facilitate engagement with the management team on workplace conditions in Cote d’Ivoire</p>

We note that our exploration and development activities in Côte d’Ivoire are rapidly evolving and so too our exposure to new human rights risks, in particular those associated with security services and



customary land rights. We shall routinely review our salient human rights issues to keep pace with these changes.

*Priority actions in 2022:*

- *Monitor the progress and effectiveness of existing actions that aim to mitigate the salient human rights issues within our workplace as identified in 2021. Based on these monitoring results, review and update the risk assessment and mitigating actions.*
- *Conduct a human rights review of our Doropo Project in Côte d'Ivoire using the UNGPs reporting framework.*

#### **4.1.3 Workforce Engagement**

Effective workforce engagement instils a shared understanding of the critical behaviours required for successful performance and more broadly, improves personal wellbeing.

We deploy a variety of mechanisms to engage with our workforce including: operational and management meetings; pre-shift meeting and workplace inspections; quarterly risk review; performance appraisal and objective setting; training and development programmes; bulletins and notice boards; employee surveys; and social and cultural events. Through this engagement, we strive to reinforce purpose and values, levels of workplace proficiency and the confidence of our workers to raise concerns. Extraordinary engagement activities in 2021 included: extensive consultation with workers and health authorities to facilitate the promotion and roll-out of the COVID-19 vaccination; and in-depth interviews with a cohort of employees to support the design of our workplace mental health programme.

*Priority actions in 2022:*

- *Continue to reinforce existing workforce engagement activities not limited to: the introduction of mandatory Code of Conduct awareness training; establishment of a diversity committee at Sukari and diversity awareness training for the management team; the formalisation of engagement practices between the workers committee and management team in Côte d'Ivoire.*

#### **4.1.4 VPSHR Training**

In 2021, training was provided to our security and senior management personnel at Sukari on the Voluntary Principles on Security and Human Rights ("VPSHR"). Training participants were guided on how to conduct their daily tasks in compliance with the VPSHR and with the company's policies regarding human rights and ethical conduct.

*Priority actions in 2022:*

- *Extend VPSHR training to our security and personnel and contractors in Côte d'Ivoire.*

#### 4.1.5 **Grievance Mechanisms**

All persons working for or on behalf of Centamin are encouraged to discuss any concern or violation relating to our Code of Conduct with their supervisor or manager. Supervisors or managers, on learning of any violation of our Code, must report such incidents and take appropriate corrective action. Centamin maintains an independent Whistleblower Hotline where anyone can raise a concern in confidence and anonymously, 24 hours a day, 365 days a year, either online or by telephone.

In Egypt we recognise that cultural factors are likely to inhibit persons from lodging complaints or grievances through formal mechanisms and with Company representatives outside their supportive network of family and friends. We are continuing to address this constraint through the reinforcement of existing mechanisms and other forms of employee engagement.

*Priority actions in 2022:*

- *Reinforce workplace awareness of our incident reporting mechanisms through the introduction of mandatory Code of Conduct awareness training for all persons working for or on behalf of the Company.*

## 4.2 **Our Supply Chain**

We acknowledge that many of the goods and services we procure have long, complex and opaque supply chains, with potential for human rights risks to extend beyond our control.

We have a number of policies and processes in place to mitigate our supply chain risks, including supply chain due diligence processes. At the current time these processes primarily target our direct suppliers.

In the reporting period we have reinforced these processes to assess and address modern slavery risks within our direct supply chain as described below.

### 4.2.1 **Supplier Code of Conduct**

In 2021, we completed roll-out of our new standard terms and conditions of contract for suppliers across the group, having refreshed this process at Sukari from 2020. We now have a uniform contract template for our Group-level business activities, with consistent reference to our policy framework and our Supplier Code of Conduct.

Under the terms of contract, our suppliers agree to comply with applicable laws and meet the commitments and obligations of our Group policy framework, including: code of conduct; human rights;

anti-bribery and corruption; health and safety; environment and social responsibility. They also commit to maintain policies and procedures relating to the prevention of human rights violations.

In 2021, the Supplier Code of Conduct was communicated to all existing suppliers at Sukari with services valued at greater than US\$10k. Each supplier was requested to acknowledge their commitment to the Supplier Code of Conduct as a condition of doing business with Centamin.

We recognise that operating in environments with a multitude of different legal, cultural and business practices and requirements can be challenging. Under our Supplier Code of Conduct we offer to support our suppliers in meeting the standards expected of them.

*Priority actions in 2022:*

- *Request new suppliers at Group and asset-level to specifically acknowledge their commitment to the Supplier Code of Conduct.*

#### **4.2.2 Supply Chain Risk Screening and Due Diligence**

Under the Supplier Code of Conduct, we reserve the right to undertake due diligence and/or risk assessment of our suppliers to verify compliance. We may suspend transacting business or terminate business relationships with a supplier if we identify a reasonable risk of non-compliance with the terms of contract.

Commercial risk screening is routinely undertaken on new suppliers, prior to any contract being signed, and periodically every two years thereafter. New suppliers are required to complete a pre-qualification questionnaire that aims to identify regulatory risk, financial risk, potential conflict of interest and anti-bribery and corruption checks. In 2021, 210 suppliers completed a pre-qualification questionnaire.

In 2021, we introduced an ESG risk screening process at Sukari to be applied to all existing and new suppliers. Under this process, suppliers are classified based on criteria including:

- Country of operation (applying both Walk Free Foundation<sup>8</sup> and World Bank governance indicators<sup>9</sup>);
- Direct handling of hazardous processes or substances; and
- Reputational and commercial risk factors.

This ESG risk screening was completed for 22% of suppliers (numbering 190), of which, approximately 30% were identified as 'high-risk' – primarily owing to their location in Egypt which is rated as a relatively high-risk jurisdiction on global indices for governance risk.

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<sup>8</sup> Walk Free Foundation, 2018. The Global Slavery Index 2018

<sup>9</sup> <https://databank.worldbank.org/source/worldwide-governance-indicators>

For those suppliers screened as 'high-risk', we developed a self-assessment ESG due diligence questionnaire. The questionnaire is designed to assess (i) organisational capacity to manage environmental, social and governance risk, and (ii) level of conformance to Centamin's Supplier Code of Conduct. If the questionnaire confirms a supplier to be 'high-risk', they will be escalated for additional due diligence. It is envisaged that the information collected from the questionnaire will enrich our understanding of ESG risk within our supply chain, including the risk of modern slavery.

In 2021, we commenced the roll-out of this due diligence questionnaire at Sukari. All existing suppliers with services valued at greater than US\$10k were invited to complete the questionnaire. We received 366 responses, representing over 40% of all suppliers. This information will be collated and analysed in 2022 to facilitate (i) a better understanding of our supply chain risk profile and (ii) the effectiveness of our due diligence tools to assess 'high-risk' suppliers.

*Priority actions in 2022:*

- *Complete the preliminary ESG risk screening for all existing suppliers at Sukari. Integrate ESG risk screening into the onboarding process for new suppliers.*
- *Analyse the supplier responses to the self-assessment ESG due diligence questionnaire undertaken at Sukari and characterise aspects that are deemed 'high-risk', including the risk of modern slavery. Refine the application of processes to effectively identify and assess these risks.*

## 5 ASSESSING THE EFFECTIVENESS OF OUR APPROACH

We consider an effective response to modern slavery is one where, we effectively identify modern slavery risks, mitigate those risks and respond appropriately to evidence of modern slavery.

We have in place governance processes, a policy framework and procedures to support our response to modern slavery risks. While committed to the continuous improvement of our governance and management systems, we judge that these measures are effective in the mitigation of modern slavery risks arising from our direct operational activities as described in Section 4.1. We are pleased to report that in 2021, no human rights impacts nor incidents were recorded within our direct operational activities either through our human resource management systems, employee engagement processes, internal or external grievance mechanisms, Whistleblower Hotline or other.

Concerning the mitigation of modern slavery risk within our supply chain, we have reinforced the application of our standard terms and conditions of contract across the business, under which our suppliers must acknowledge their adherence to our Code of Conduct. We have also introduced new ESG risk screening and due diligence processes at Sukari and trialled the application of a supplier self-assessment questionnaire. We have had a positive response from our suppliers to the self-assessment questionnaire and believe that this will be an effective measure for identifying modern slavery risk and the requirement for additional due diligence. The results of the self-assessment questionnaire are the subject of ongoing analysis in 2022.

We acknowledge that many of the goods and services we procure have long, complex and opaque supply chains, with potential for human rights risks to extend beyond our control. Notwithstanding, we

are committed to advancing the maturity and reach of our governance and management processes to mitigate modern slavery risks.

For the year ahead, we have identified actions for continuous improvement in our governance and management processes and will evaluate our progress towards the achievement and effectiveness of these actions in our 2022 Modern Slavery Statement.

## 6 CONSULTATION WITH OWNED AND CONTROLLED ENTITIES

All of our owned and controlled entities operate under Centamin's governance structure and policy framework as described in Sections 3.2 and 3.3 of this Statement.

The preparation of this Statement was led by our Group Sustainability Team in consultation with each reporting entity and input from asset-level management teams, risk, finance and procurement functions.

Progress on the implementation of our ESG risk controls and management assurance processes as described in this Statement are routinely reported by our operational assets, and material developments are in turn reported to Centamin's Executive, Sustainability Committee and the Board.

This final Statement is presented to Centamin's Board for approval.

***Approved by the Centamin plc Board of directors on 13 July, 2022***

***For Centamin plc***



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***Martin Horgan, CEO***