

## MODERN SLAVERY STATEMENT, FOR THE FISCAL YEAR ENDING DECEMBER 31, 2023

*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 2023 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 supply chain due diligence practices including the application of third-party risk assessment tools.*

*We recognise that the review and assessment of our actions to identify and address 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 2023 to 31 December 2023. 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 in liquidation.

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.

In demonstration of our commitment to continuous improvement, priority actions for 2024 to address the risk of modern slavery in our business and supply chain are presented in Appendix A.

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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.

This Statement was approved by Centamin’s Board of Directors on 21<sup>st</sup> May 2024 on behalf of the reporting entities listed above and has been signed by the Chief Executive Officer.

## 2 HIGHLIGHTS

Key actions undertaken in 2023 to assess and address modern slavery risks are summarised in Table 1 and detailed in Section 5.

**Table 1 – Performance highlights for 2023**

Highlights	Scope
Roll-out of training modules covering Code of Conduct and Human Rights to all management roles	Group
No human rights impacts nor incidents were recorded from our business activities through our grievance mechanisms or independent whistleblower hotline	Group
100% of our suppliers assessed through an internal due diligence process	Sukari
Third-party due diligence of all suppliers identified as ‘high-risk’ plus newly onboarded suppliers with services valued at over US\$20k, totalling 389 suppliers	Group
All active suppliers have acknowledged their commitment to Centamin’s Supplier Code of Conduct under standard terms and conditions of contract	Sukari
Review and update of the salient human rights risks applicable to our assets guided by the UN Guiding Principles on Business and Human Rights reporting framework	Sukari and Doropo
Independent consultant engaged to deliver a multi-level VPSHR train the-trainer programme to our senior management and security leadership group, plus our private and public security partners	Doropo

## 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 20 active subsidiary entities providing corporate technical services (in Jersey, UK and Australia) and exploration, development and mining activity (in Egypt and Côte d’Ivoire).

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 Côte d’Ivoire encompasses greenfield exploration projects where we have advanced a definitive feasibility study and environmental and social impact assessment for the Doropo Project.

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 MKS Pamp at their Switzerland-based refinery. MKS Pamp is an associate member of the London Bullion Market Association (“LBMA”) and a certified member of the Responsible Jewellery

Council with Chain-of-custody certification. Once refined, the gold is sold by MKS Pamp to one or more market participants who take responsibility for its onward distribution to industry users, predominantly in the investment, jewellery, electronics and industrial sectors.

**Table 2 – Our Assets and Ownership**

Asset	Operational Status	Location	Ownership
<b>Sukari Gold Mine</b>	Operating gold mine	Red Sea, Egypt	50%
<b>Egyptian Desert Exploration</b>	Greenfield gold exploration	Red Sea, Egypt	100%
<b>Doropo Project</b>	Advanced gold exploration	Bounkani region, Côte d'Ivoire	100%
<b>ABC Project</b>	Greenfield gold exploration	Kabadougou and Bafing regions, Côte d'Ivoire	100%

**Table 3 – Global Slavery Index for jurisdictions in which we operate**

Country	Prevalence Index <sup>3</sup>	Government Response Index <sup>4</sup>	Vulnerability to Modern Slavery <sup>5</sup>
<b>Egypt</b>	4.3	44	59
<b>Côte d'Ivoire</b>	7.3	37	59

### 3.2 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 2023, Centamin had 2,356 employees of which 2,262 persons (equivalent to 96%) work in Egypt, 3% in Côte d'Ivoire, and the remaining in corporate officing (Jersey, UK and Australia) – as presented in Figure 1. The majority of our employees are full-time and permanent.

An additional 2,546 contractors are engaged by Centamin to perform exploration and mining services of which 91% work in Egypt.

<sup>3</sup> <https://www.walkfree.org/global-slavery-index/2018/methodology/prevalence/#table:4>, estimated prevalence of modern slavery per 1,000 people 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. Rating is on a scale of 0 to 100, with 100 being the highest level of action by governments.

<sup>5</sup> <https://www.walkfree.org/global-slavery-index/2018/methodology/vulnerability/>, measures the factors linked to the risk of modern slavery in each country. Rating is on a scale of 0 to 100, with 100 being the highest vulnerability to modern slavery.

Figure 1 – Workforce demographic

	TOTAL	HEAD OFFICE	EGYPT		CÔTE D'IVOIRE	
EMPLOYEES			Expatriate	National	Expatriate	National
<b>MALE</b>	2,275	20	103	2,100	6	46
<b>FEMALE</b>	81	8	0	58	2	13
<b>TOTAL</b>	2,356	28	103	2,159	8	59
<b>CONTRACTORS</b>						
<b>MALE</b>	2,506	-	56	2,247	31	172
<b>FEMALE</b>	40	-	1	7	0	32
<b>TOTAL</b>	2,546	-	57	2,254	31	204
<b>TOTAL COMBINED WORKFORCE</b>	<b>4,902</b>	<b>28</b>	<b>160</b>	<b>4,413</b>	<b>42</b>	<b>263</b>

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.

### 3.3 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 under standard terms and conditions of contract which includes commitment to Centamin's Code of Conduct.

Approximately 97% of our Group-level cash operating costs is at Sukari, where the main types of procurement by value are fuel and oils, contractor services, general consumables, and reagents. Of the

approximately 1200 active suppliers in 2023, the majority by number (55%) and by value (80%) are located in Egypt, followed by Europe (10%).

The principal goods and services we source internationally include: reagents (cyanide, flotation reagents); other consumables (forged grinding media and accessories); Original Equipment Manufacturer (“OEM”) plant and spares (power generation, other fixed and mobile equipment); communications hardware and software.

## 4 IDENTIFYING OUR MODERN SLAVERY RISKS

To identify our risk of involvement in modern slavery, we are guided by the UN Guiding Principles on Business and Human Rights’ and which include:

- **Cause:** any of our actions or omissions that directly result in modern slavery.
- **Contribute:** any of our operations or supply chain activities that may incentivise or facilitate modern slavery.
- **Directly linked to modern slavery:** any relationship with another entity that is involved in modern slavery practices

### 4.1 Operational Activities

Despite operating in high-risk jurisdictions, as classified by the ‘Global Slavery Index’, we consider the risk of modern slavery in our direct operational activities to be low, due to the existence of robust group-wide governance controls that apply to human resource management, workplace conditions and contractor management.

We acknowledge that there is still a risk of modern slavery in our operations if the controls that are in place are not effectively managed and hence the importance of our multi-layered management assurance processes.

### 4.2 Supply Chain

We have introduced various due diligence processes to help us identify, assess and address the risk of modern slavery with our direct (tier 1) suppliers as described in section 5.4.2 below. We acknowledge that many of the goods and services we procure have long, complex and opaque supply chains, with the potential for modern slavery and human rights risks. These risks may extend well beyond the reach of our current tier 1 supplier due diligence processes. Elements of our supply chain that are deemed higher risk include:

- Freight and transportation – we operate in remote locations and our upstream supply chain is reliant on both domestic and international freight and transportation.
- Goods and services sourced from countries where the prevalence of modern slavery is recorded as high – approximately 52% of our tier 1 suppliers are based in jurisdictions that we classify as high risk.
- Hazardous materials – a number of our suppliers either process or handle hazardous materials, including cyanide, high explosives, acids and alkalis; where workers could be exposed to increased risk to their occupational health and safety.

## 5 ASSESSING AND ADDRESSING OUR MODERN SLAVERY RISKS

The approach to the management of modern slavery risks is underpinned by our risk management framework as presented on the Centamin website<sup>6</sup>. This prioritises risk mitigation where this has potential impact on our direct operational activities and secondly within our direct supply chain. We 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 2024 to further mitigate modern slavery risks in our business and supply chain are highlighted in appendix A.

### 5.1 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 have ultimate accountability for the Company's sustainability performance. 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/>.

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 41 to 53 of the 2023 Annual Report: <https://www.centamin.com/media/3056/centamin-ar23-web.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.

### 5.2 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/>) and as relevant to modern slavery are outlined below, including: Human Rights, Code of Conduct, Our People, Diversity and Inclusion, Social Responsibility, Anti-corruption and Bribery and Whistleblower Hotline.

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<sup>6</sup> <https://www.centamin.com/about/risk-opportunity-management/>

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>7</sup> (“RGMPs”).

Our policies are reviewed annually and any amendments are approved by the Board.

**Table 4 – Our policy framework as relevant to Modern Slavery**

Policy	Description	Implementation
<b>Code of Conduct</b>	Our Code of Conduct <sup>8</sup> sets out our key principles and expectations for the behaviour of all those working for, working with, or representing Centamin. It guides the decisions we make in general terms and underpins the rest of our policy framework. The Code of Conduct highlights our commitment to respecting human rights, and conducting business fairly, responsibly, ethically and legally	All new employees and third-party workers are provided awareness of the requirements of the Code of Conduct as part of their onboarding.  All management personnel are required to complete a Code of Conduct training module.
<b>Human Rights Policy</b>	Our Human Rights Policy <sup>9</sup> 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	All management personnel are required to complete a Human Rights training module.  100% of our security staff at have received third-party VPSHR training.

<sup>7</sup> <https://www.gold.org/industry-standards/responsible-gold-mining>

<sup>8</sup> [https://www.centamin.com/media/2866/cey\\_code-of-conduct\\_20220714-002.pdf](https://www.centamin.com/media/2866/cey_code-of-conduct_20220714-002.pdf)

<sup>9</sup> [https://www.centamin.com/media/3043/cey\\_human\\_rights\\_policy\\_2023\\_en\\_review\\_march\\_2024-signed-by-mh.pdf](https://www.centamin.com/media/3043/cey_human_rights_policy_2023_en_review_march_2024-signed-by-mh.pdf)

Policy	Description	Implementation
<p><b>Supplier Code of Conduct</b></p>	<p>Our Supplier Code of Conduct sets out our ESG expectations as applicable to our suppliers.</p> <p>It specifically highlights that the supplier must respect human rights and labour standards, and not engage in any form of Modern Slavery.</p>	<p>The Supplier Code of Conduct is provided to all suppliers during the onboarding process.</p> <p>As a condition of doing business, suppliers acknowledge their commitment to our Supplier Code of Conduct and to maintain policies and procedures related to the prevention of human rights violations.</p> <p>We reserve the right to conduct supplier due diligence to verify the supplier's commitment to our Supplier Code of Conduct. Failure to remedy any violations will result in the Supplier having their contracts and future relationship reviewed, and could result in the termination of the supplier relationship.</p>
<p><b>People Policy</b></p>	<p>Our People Policy<sup>10</sup> reflects our intent to set measurable objectives and targets that will drive continual improvement in people performance, including measures to provide a safe, encouraging and inclusive work environment.</p> <p>It explicitly states that we prohibit forced labour and modern slavery in our operations and in our supply chains, and take measures to address these risks as documented in our annual Modern Slavery Statement</p>	<p>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.</p>
<p><b>Whistleblower Policy</b></p>	<p>Our Whistleblowers Policy<sup>11</sup> outlines the steps to take when incidents relating to workplace fraud or mismanagement are identified (including acts of modern slavery and human rights abuses), what constitutes these incidents and the channels by which you can raise concerns.</p>	<p>We maintain an independent whistleblower hotline that allows workers, suppliers and third-parties to anonymously file a complaint.</p> <p>All workers receive information on the Policy as part of their induction; and suppliers are informed under their standard terms of contract.</p>

<sup>10</sup> [https://www.centamin.com/media/3042/cey\\_people-\\_policy\\_en\\_2023\\_review\\_march\\_2024-signed-by-mh.pdf](https://www.centamin.com/media/3042/cey_people-_policy_en_2023_review_march_2024-signed-by-mh.pdf)

<sup>11</sup> [https://www.centamin.com/media/3047/cey\\_whistleblowers\\_policy\\_march-2024.pdf](https://www.centamin.com/media/3047/cey_whistleblowers_policy_march-2024.pdf)

## 5.3 In Our Operations

### 5.3.1 Human Rights Risk Management

We assess the salient human rights issues of relevance to our business against the United Nations Guiding Principles (“UNGPs”) reporting framework and the adequacy of our management measures for responding to these risks. At Sukari, human rights risks include occupational health and safety, favourable work conditions and rights of non-discrimination in employment. As a result of our review, Right to Self Determination and Right not to be Subjected to Slavery, Servitude or Forced Labour were added to our salient human rights list for Sukari.

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 Côte d’Ivoire, the principal area of human rights risk concerns interactions between private and public security and illegal artisanal miners.

Our salient human rights risks for Sukari are presented on pages 52 to 53 of our 2023 Sustainability Report<sup>12</sup>, including the key activities undertaken in 2023 to address each.

### 5.3.2 Training and awareness

Our policies, including Centamin’s Code of Conduct and Human Rights Policy, are available on Centamin’s website and displayed in English and the language of the host nation at asset level.

The Code of Conduct is communicated to all employees during their onboarding process and then every 2 years during refresher training. In 2023 we introduced a Code of Conduct training module for all management personnel.

As of end 2023, all security personnel at Sukari and Doropo had received training 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.

At Doropo, we engaged an independent consultant to develop and deliver a multi-level VPSHR train the-trainer programme. The training was successfully delivered to our senior management and security leadership group, plus our private and public security partners.

### 5.3.3 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.

### 5.3.4 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.

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<sup>12</sup> [https://www.centamin.com/media/3059/centamin-sr23\\_web.pdf](https://www.centamin.com/media/3059/centamin-sr23_web.pdf)

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.

## 5.4 Our Supply Chain

### 5.4.1 Supplier Code of Conduct

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.

All of our active suppliers at Sukari and all suppliers with whom we have contracts with in Ivory Coast, have acknowledged their commitment to our Supplier Code of Conduct as a condition of doing business with us.

Under standards 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.

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.

### 5.4.2 Supply Chain ESG Due Diligence

All new suppliers are routinely subject to commercial and regulatory risk screening, 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 such risks, including any potential conflict of interest and anti-bribery and corruption checks.

All new suppliers at Sukari were also subject to our ESG risk screening process, which included assessing for modern slavery risk. Under this process, suppliers are classified as low, moderate or high risk based on criteria including:

- Country of operation (applying both Walk Free Foundation<sup>13</sup> and World Bank governance indicators<sup>14</sup>);
- Direct handling of hazardous processes or substances; and
- Reputational and commercial risk factors.

Approximately 8% of our active supplier list was classified as 'high-risk' – primarily owing to their location in Egypt which is rated as a relatively high-risk jurisdiction on global indices for country governance risk and vulnerability to modern slavery.

For those suppliers screened as 'high-risk', it was requested that they complete 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

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<sup>13</sup> Walk Free Foundation, 2018. The Global Slavery Index 2018

<sup>14</sup> <https://databank.worldbank.org/source/worldwide-governance-indicators>

Supplier Code of Conduct. If the questionnaire confirms a supplier to be 'high-risk', they will be escalated for additional due diligence which may include: targeted enquiries with the supplier to address data gaps; site visits and in-person meetings; and/or offering remediation advice to mitigate risk.

Through their participation in the ESG due diligence questionnaire, the majority of these 'high-risk' suppliers reported that they had in place appropriate human resources and systems of governance (policies, procedures) to manage risks associated with labour standards, human rights, occupational health and safety, environmental and social performance. None of these suppliers reported that they had been the subject of legal dispute or criminal convictions on ESG matters.

In 2023, zero incidents of modern slavery were identified through this level of due diligence and we did not terminate any supplier relationships due to our findings.

### **5.4.3 Third-Party ESG Due Diligence**

In 2023, we engaged third-party services to assess a broader scope of business-critical risk data on suppliers to our owned and controlled entities, including: incidents of reported regulatory non-compliance; adverse media; sanctions data and politically exposed persons. This enhanced level of assurance was extended to 389 suppliers, that met one or more of the following criteria: (i) the commercial value of services exceeded US\$20,000 in 2023; (ii) newly onboarded in 2023; or (iii) previously identified as 'high-risk'.

The majority of these suppliers returned a null search result, indicating that there have been no publicly recorded incidents of ESG risk. We note however, potential limitations in the accessibility of governance tools in some jurisdictions.

In total, 17 'alerts' were generated from this third-party due diligence but none of these alerts concerned incidents of modern slavery. All alerts were reviewed for relevancy to Centamin and potential conflict with our Supplier Code of Conduct.

## **6 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.

The following outlines how we assess the effectiveness of our approach to managing modern slavery risks within our direct operations.

- ESG due diligence procedures: we have put in place standard procedures for ESG due diligence including protocols for escalation.
- Assurance reviews: we conduct routine internal human rights assurance reviews and periodic independent reviews.
- Human rights training: persons in roles of responsibility to safeguard human rights are provided appropriate training and awareness.
- Grievance mechanisms: we aim to respond effectively to grievances raised through out internal processes and independently monitored Whistleblower hotline.

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 5.3.

We are pleased to report that in 2023, 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.

We acknowledge that many of the goods and services we procure have long, complex and opaque supply chains, with potential for modern slavery and 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.

The main process for assessing the effectiveness of our approach within our supply chain is through the Supplier due diligence process. We monitor and report on the number of suppliers that are risk assessed during onboarding, the number classified as 'high-risk' and that are required to complete the self assessment, and the number escalated for further due diligence. These internal processes are supplemented by third-party due diligence to assess a broader scope of business-critical risk data relating to our suppliers and partners, including: incidents of reported regulatory non-compliance; adverse media; sanctions data; and politically exposed persons.

We will continue to assess the effectiveness of these processes to ensure we identify and remediate all material risks in our supply chain.

For the year ahead, we have identified actions for continuous improvement in our governance and management processes as listed in appendix A and will evaluate our progress towards the achievement and effectiveness of these actions in our 2024 Modern Slavery Statement.

## 7 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 5.1 and 5.2 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 22<sup>nd</sup> May 2024**

**For Centamin plc**

  
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**Martin Horgan, CEO**

## APPENDIX A – ACTION PLAN

2023 Priority Actions	Progress against 2023 Priority Actions	2024 Priority Actions
<b>Policy Amendments</b>		
<p><b>Collaborate with asset level management teams to implement the Code of Conduct into their management systems.</b></p> <p><b>Extend the roll-out of our Supplier Code of Conduct to all owned and controlled entities.</b></p>	<p>Review and update of asset-level human resource policy and procedures, including site induction programme, to align with the Code of Conduct.</p> <p>Introduction of a Code of Conduct training module.</p>	<p>Continue to reinforce implementation of the Code of Conduct at asset level.</p> <p>Extend the roll-out of our Supplier Code of Conduct to all owned and controlled entities.</p> <p>Routine annual review of policy framework</p>
<b>Human Rights Risk Assessment</b>		
<p><b>Annual review of the salient human rights issues and mitigations in place at asset-level</b></p>	<p>Review of the salient human rights and the current mitigations completed at Sukari and Doropo.</p>	<p>Annual review of the salient human rights issues and mitigations in place at asset-level.</p>
<p><b>Review and take action on the mitigations and recommendations from the independent report on human rights risks at the Doropo project.</b></p>	<p>Independent consultant engaged to deliver a multi-level VPSHR train-the-trainer programme to our senior management and security leadership group, plus our private and public security partners</p>	<p>Deliver the VPSHR train-the-trainer programme to our senior management and security leadership group in Egypt.</p>
<b>Workforce Engagement</b>		
<p><b>Maintain Gender and Diversity Committee at Sukari</b></p>	<p>Monthly meetings maintained by Gender and Diversity Committee to systematically identify and resolve barriers to the advancement and fair treatment of women in the workplace</p>	<p>Maintain Gender and Diversity Committee at Sukari.</p>

2023 Priority Actions	Progress against 2023 Priority Actions	2024 Priority Actions
	Under the direction of the Gender Diversity Committee, we ran our first female engagement survey with 100% of Sukari's female employees participating.	
<b>Launch of Sukari Magazine, an internal publication designed to reinforce employee engagement</b>	This quarterly publication is available to all workers and highlights operational developments, showcases employee achievements and reinforces our Values and culture.	Maintain publication of the Sukari Magazine
<b>Maintain routine engagement between management and employee representatives</b>	Regular meetings held between management and employee-elected committee to discuss workplace issues and concerns	Maintain routine engagement between management and employee representatives
<b>Training and awareness</b>		
<b>Launch Code of Conduct training module at all owned and controlled entities</b>	Code of Conduct training module introduced to all management personnel	Reinforce Code of Conduct training and awareness throughout business.
<b>Extend diversity awareness training to middle management at Sukari</b>	Diversity awareness training delivered to all senior and middle management team at Sukari.	Reinforce gender diversity and inclusion training
<b>Third-party advanced VPSHR training to be delivered to all security personnel and contractors in Côte d'Ivoire</b>	Independent consultant engaged to develop and deliver a multi-level VPSHR train-the-trainer programme at Doropo. The training was successfully delivered to our senior management and security leadership group, plus our private and public security partners.	Conduct refresher VPSHR training to all security personnel and contractors at asset-level
<b>Grievance Mechanisms</b>		
<b>Enhance awareness of our Whistleblower policy through the onboarding of new suppliers and its</b>	Revision of the Whistleblower policy to reinforce application to modern slavery risk	Enhance awareness of our Whistleblower policy within our supply chain

2023 Priority Actions	Progress against 2023 Priority Actions	2024 Priority Actions
<b>applicability to cases of modern slavery and human rights violations</b>	New suppliers are required to read and comply with Centamin's Code of Conduct including the Whistleblower Policy-	
<b>Supplier Code of Conduct</b>		
<b>Extend the roll-out of our Supplier Code of Conduct to all owned and controlled entities.</b>	Our Supplier Code of Conduct is appended to our standard terms and conditions of contract for goods and services and should be adhered to as a condition of doing business with Centamin.	Develop group-level Supplier Code of Conduct
<b>Supply Chain Risk Screening and Due Diligence</b>		
<p><b>Conduct ESG risk screening on all new suppliers at Sukari and extend the application of this tool to Cote d'Ivoire.</b></p> <p><b>Extend our understanding of modern slavery risk beyond our Tier 1 suppliers at Sukari.</b></p> <p><b>Further investigate the effectiveness of third-party ESG risk screening tools.</b></p>	<p>ESG risk screening complete for all new suppliers at Sukari</p> <p>Third-party service provider engaged to access a broader scope of business-critical risk data relating to our suppliers and partners including incidents of reported regulatory non-compliance; adverse media; sanctions data and politically exposed persons.</p>	Collaborate with our Tier 1 suppliers to extend our understanding of modern slavery risk
<b>Formalise the escalation process for ESG due diligence at Sukari including the conduct of facility inspections to verify supplier information.</b>	All 'high-risk' suppliers have completed their self-assessment questionnaires, the results analysed and escalated to the appropriate level of the ESG due diligence process.	Set annual targets for the physical inspection of 'high-risk' supplier facilities