

## MODERN SLAVERY STATEMENT, FOR THE FISCAL YEAR ENDING DECEMBER 31, 2020

*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.*

**Martin Horgan CEO**

### 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”) and constitutes our modern slavery statement in response to Section 54 of the UK Modern Slavery Act (the “Act”), for the year ending 31 December 2020. This statement sets out Centamin’s commitment to respect human rights and highlights key actions we are taking to address risks in our business and our supply chain, including risks associated with modern slavery.

### Our Business

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 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 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.

As of 31 December 2020, Centamin had approximately 1,700 employees and 1,400 contractors with 95% of these persons based in Egypt and the remaining 5% in Côte d’Ivoire, Burkina Faso and corporate officing (Jersey, UK and Australia). Our assets and modern slavery risks identified by the Global Slavery Index are summarised in Table 1.

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

**Table 1 – Global Slavery Index for Centamin assets**

Asset	Country	Prevalence Index Rank <sup>2</sup>	Government Response Index <sup>3</sup>
Sukari Gold Mine	Egypt	63	B
Doropo, ABC exploration projects	Côte d'Ivoire	56	B
Konkera exploration project	Burkina Faso	76	CCC

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.

### 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 company’s overall approach to sustainability, as well as developing and implementing short and long-term operating performance standards. The Sustainability Committee provides support to the Board by monitoring the Group’s sustainability performance encompassing social responsibility and human rights; environmental responsibility; health, safety and labour rights.

The remit of the Sustainability Committee includes the review of Centamin’s practices in relation to the UK 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. We continuously monitor and refine our 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 the 2020 Annual Report: <https://www.centamin.com/media/2384/centamin-plc-annual-report-2020-web-ready-secured.pdf>

<sup>2</sup> <https://www.globallslaveryindex.org/2018/countrydata>, average prevalence of modern slavery at the country level (the lower the number the more prevalent the risk)

<sup>3</sup> <https://www.globallslaveryindex.org/2018/methodology/government-response/>, assessment of the actions governments are taking to respond to modern slavery

## 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/>) covering aspects including: **Human Rights, Code of Conduct, Diversity, Social Responsibility, Anti-corruption and Bribery** and **Whistleblower**.

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 (“RGMPs”).

The Human Rights Policy sets out our commitment to respect the human rights of our workforce, affected communities and the rights of all individuals with whom we interact. It expressly opposes all forms of slavery, forced or compulsory labour and child labour, both within our organisation and our supply chain. The standards expected of our suppliers are incorporated into the terms and conditions of contract and detailed in our Supplier Code of Conduct.

## Our People

Our Company purpose is to create opportunity for people through responsible mining. Centamin’s Code of Conduct affirms our commitment to uphold high moral and ethical principles and specifies the basic norms of behaviour for employees and other 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 2020, Centamin had approximately 1,700 employees of which 1,600 persons (equivalent to 94%) work in Egypt, and the remaining 6% in Côte d’Ivoire, Burkina Faso and corporate officing (Jersey, UK and Australia) – as presented in Figure 1. All employees, with only a few exceptions, are full-time and permanent.

An additional 1,424 contractors are engaged by Centamin to perform exploration and mining services of which 96% work in Egypt and the remaining 4% in Côte d’Ivoire.

WORKFORCE DEMOGRAPHIC								
	TOTAL	HEAD	EGYPT		BURKINA FASO		CÔTE D'IVOIRE	
		OFFICE	Expat	National	Expat	National	Expat	National
<b>EMPLOYEES</b>								
Male	1,683	15	77	1,529	–	14	6	42
Female	26	9	1	1	–	2	–	12
<b>Total</b>	<b>1,709</b>	<b>24</b>	<b>78</b>	<b>1,530</b>	<b>0</b>	<b>16</b>	<b>6</b>	<b>54</b>
<b>CONTRACTORS</b>								
Male	1365	–	91	1,274	–	–	0	51
Female	8	–	–	–	–	–	–	8
<b>Total</b>	<b>1,424</b>	<b>0</b>	<b>91</b>	<b>1,274</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>59</b>
<b>TOTAL COMBINED WORKFORCE</b>	<b>3,133</b>	<b>24</b>	<b>169</b>	<b>2,804</b>	<b>0</b>	<b>16</b>	<b>6</b>	<b>113</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.

**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.

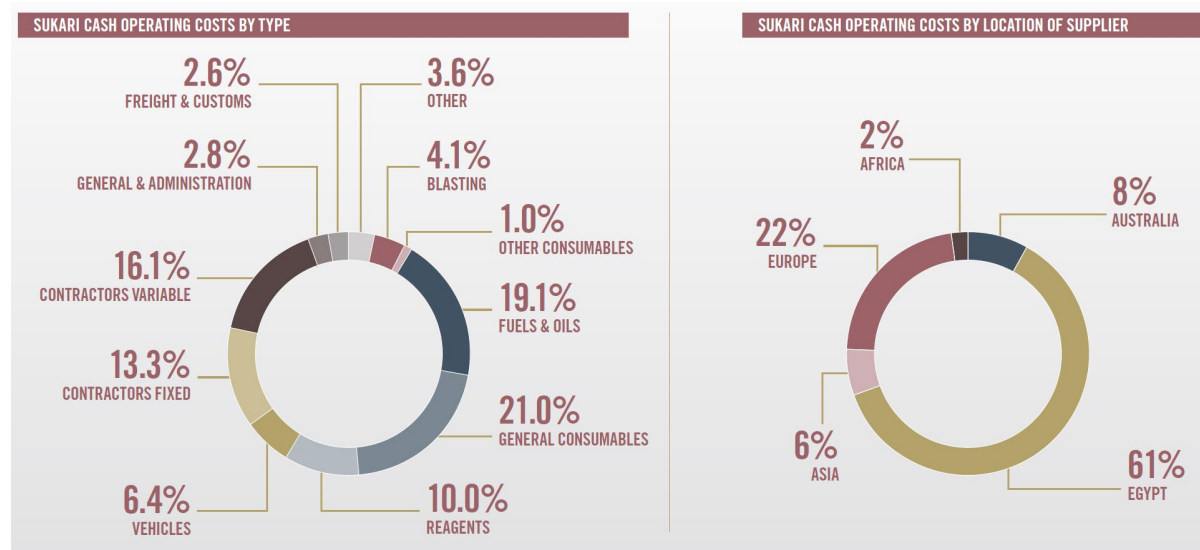
We are committed to using only those suppliers that adhere to the same fundamental principles as our own relating to legal compliance, fairness, honesty and anti-corruption. This includes compliance with applicable laws and the principles set out in our Supplier Code of Conduct which includes anti-bribery and corruption, human rights, health and safety, environment and social responsibility. Where gaps in local capacity are identified, we work collaboratively to address these short-comings.

In 2020 we had over 800 active direct suppliers that supported the operation of Sukari and 160 active direct suppliers to support corporate activities.

At Sukari, the main types of procurement by value are general consumables, fuel and oils, contractor services and reagents. Of the 800 suppliers at Sukari, the majority by number (60%) and by value (61%) are located in Egypt followed by Europe (22%) and Australia (8%) – 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.

Our main corporate-level suppliers provide professional services to our teams in Jersey and the UK. The principal suppliers include technical consultants, legal, insurance, financial advice and IT.



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

## Our 2020 Performance: Due Diligence Processes, Risk Assessment and Management

Our sustainability performance is broadly presented in our annual Sustainability Report, which is aligned with the GRI Sustainability Reporting Standards (“GRI”) and the Sustainability Accounting Standards Board (“SASB”). Our 2020 Sustainability Report is available on our website:

<https://www.centamin.com/media/2390/cey-sr20.pdf>

Centamin is pleased to report that no human rights incidents nor impacts were recorded from our business activities in 2020. Key areas of performance are summarised below.

### Workforce Engagement

In 2020, an anonymous survey was undertaken by the mid-level management team at Sukari to assess employees’ views on matters including employee engagement, relations, training and development, workplace culture and values. The survey results highlighted the focus we must place on our people through reinforcement of purpose and values, training and development, and the confidence to raise concerns. While we have made good progress on a number of these elements, a more systematic and structured approach is needed to workforce engagement comprising various formal and informal mechanisms.

In 2020, no human rights incidents nor impacts were recorded from our business activities either through our internal or external grievance mechanisms, employee engagement processes, whistleblower hotline or other. 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 addressing this constraint through the reinforcement of existing mechanisms and other forms of employee engagement.

### Human Rights Assessment

As guided by the United Nations Guiding Principles (“UNGPs”), we undertook a preliminary assessment of our most significant or salient human rights issues – those that are deemed most at risk of being impacted as a result of the Company’s activities. With a focus on Sukari, this internal assessment identified six salient issues as outlined in Figure 3.

SALIENT HUMAN RIGHTS ISSUES AT SUKARI AND 2020 ACTIVITIES	
<b>Right to life</b>	Continuous improvement in health and safety management systems and practice within our workplace, including introduction of Critical Risk standards.
<b>Right to favourable conditions of work</b>	Continuous improvement in health and safety management systems and practice within our workplace, including introduction of Critical Risk standards. Introduction of revised standard terms and conditions of contract for new suppliers with clear reference to human rights standards. Introduction of Supplier Code of Conduct, now annexed to all supplier contracts.
<b>Right to health</b>	Continuous improvement in health and safety management systems and practice within our workplace, including introduction of Critical Risk standards. Employment of Chief Medical Officer. Community investment in primary health services and assistance to vulnerable groups.
<b>Rights of non-discrimination in employment</b>	Development of a revised employee induction training programme including provision for human rights, for roll-out in 2021. Introduction of revised standard terms and conditions of contract for new suppliers with clear reference to human rights standards. Introduction of Supplier Code of Conduct, now annexed to all supplier contracts.
<b>Right not to be subjected to slavery or forced labour</b>	Disclosure of our annual Modern Slavery Statement. Introduction of revised standard terms and conditions of contract for new suppliers with clear reference to human rights standards. Introduction of Supplier Code of Conduct, now annexed to all supplier contracts. Development of a methodology for assessing human rights risk within our supply chain, for roll-out in 2021. Development of a Supplier Code of Conduct questionnaire, for roll-out in 2021.
<b>Right to adequate standard of living</b>	Upgrade of accommodation and recreational facilities, health education, larger variety of meal options. Community investment in primary health services and assistance to vulnerable groups.

Figure 3 – Salient human rights issues at Sukari

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

At Sukari we introduced a revised standard terms and conditions of contract for new suppliers with clear requirement to safeguard human rights, and introduction of a Supplier Code of Conduct which is now annexed to all supplier contracts. The Code of Conduct covers various aspects including health and safety, labour standards, anti-bribery and corruption, community and security, and environmental standards.

All new suppliers are required to adhere to the Code of Conduct as a condition of doing business with Centamin. This includes the commitment to maintain policies and procedures relating to the prevention of human rights violations. In 2021, this Code of Conduct will be communicated to all existing suppliers.

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

Under the 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 above.

## ***Integrating Human Rights into Supply Chain Risk Assessment***

Commercial and reputational risk assessment is undertaken on new suppliers, prior to any contract being signed, and periodically every two years. 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 2020, 193 suppliers completed a pre-qualification questionnaire.

In 2020 we developed a human rights risk assessment methodology for our supply chain. The methodology assesses risk on the basis of (i) jurisdiction (applying both Walk Free Foundation and World Bank indicators), and (ii) industry type (applying Global Slavery Index and US Department of Foreign Affairs list of products known to be connected to human trafficking).

In addition, we developed a Supplier Code of Conduct self-assessment questionnaire for roll-out in 2021. The purpose of the supplier questionnaire is to assess (i) organisational capacity to manage environmental, social and governance risk, and (ii) level of conformance to SGM's Supplier Code of Conduct.

## ***Our 2021 Performance Targets: Due Diligence Processes, Risk Assessment and Management***

Centamin is committed to upholding the principles as set out in our Human Rights Policy and Code of Conduct. Our priorities in 2021 will be the conduct of a systematic gap analysis against the UNGPs and continued integration of human rights assessment across our supply chain.

## ***Human Rights Due Diligence***

At Sukari we will undertake a systematic gap analysis against the UNGPs, Voluntary Principles on Security and Human Rights ("VPSHR") and other human rights standards. This analysis will help us identify strengths and gaps in our management systems and practice, enable us to focus on improvements in the most critical areas and set corresponding targets.

## ***Integrating Human Rights into Supply Chain Risk Assessment***

At Sukari we will apply our human rights risk assessment methodology to identify 'high-risk' suppliers who will be subject to increased levels of management assurance to verify conformance with our standards. This will include participation in a self-assessment questionnaire to assess (i) organisational capacity to manage environmental, social and governance risk, and (ii) level of conformance to SGM's Supplier Code of Conduct.

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

As we have done at Sukari in 2020, we will introduce a revised standard terms and conditions of contract for our procurement activities in West Africa and at corporate level, including application of our Supplier Code of Conduct.

## ***VPSHR Training***

At Sukari we will provide training to all security and senior management personnel on the VPSHR. Training participants will have knowledge and understanding of how to conduct their daily tasks in compliance with the VPSHR and with the company's policies regarding human rights and ethical conduct.

## ***Grievance Mechanism and Whistleblower Hotline***

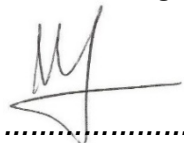
Any concerns, including those around modern slavery, can be raised through our existing asset-level grievance mechanisms including independent Whistleblower Hotline.

At Sukari and in Egypt more broadly, we recognise that cultural factors are likely to inhibit persons from lodging complaints or grievances through formal mechanisms and with persons outside their supportive network of family and friends. In 2021 we are addressing this constraint through the reinforcement of these grievance mechanisms.

***Centamin plc Board of directors approved this statement on 25 November, 2021***

***For Centamin plc***

***\*\*Martin Horgan\*\****

  
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***Board Member***