

Modern Slavery Statement (for publication on the Website)

From striving to ensure the highest levels of safety and skills for the workforce to improving socio-economic and environmental development within its host countries, operating in a socially responsible way is a strategic priority for Centamin, and we are committed to doing our part in the fight against global slavery.

Martin Horgan CEO

This voluntary statement is made on behalf of Centamin plc (Centamin) pursuant to section 54 of the Modern Slavery Act 2015 (the Act) and constitutes our slavery and human trafficking statement for the year to 31 December 2019. This statement sets out how Centamin incorporates its modern slavery activities into the social part of its sustainability agenda to achieve the greatest possible results throughout its business and supply chains.

Our structure, business and supply chains

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 conducts limited activity in its own right, with certain of its subsidiary entities carrying out exploration, development and mining activity in Egypt and West Africa.

Centamin has twenty two subsidiary undertakings. Its principal asset, the Sukari gold mine, 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. As at 31 December 2019 Centamin had almost 1,500 employees and a total workforce of 2,556 (which includes contractors) working across four countries; Egypt, Cote d'Ivoire, Burkina Faso and Jersey.

Governance

The Board of Directors of Centamin have ultimate responsibility for the implementation and management of Centamin's sustainability policies, including issues such as human rights and modern slavery. The board is supported by a dedicated Sustainability Committee (**Sustainability**) (formally Health, Safety, Environment and Sustainability Committee (the **HSES** Committee)) which oversees the company's overall approach to sustainability, as well as developing and implementing short and long-term policies and standards. The Sustainability committee provides support to the Board by monitoring the Group's safety record, sustainability performance and ethical conduct, and provides advice on all operational and community linked sustainability issues.

During 2019 the remit of the then HSES Committee included the review of Centamin's practices in relation to the UK Modern Slavery Act and appropriate steps towards minimising, mitigating and ultimately eliminating Modern Slavery from its supply chain.

Direct Suppliers We have over 650 active direct suppliers in Egypt, the location of our main operational asset and 130 active direct suppliers in Jersey, where Centamin's headquarters are located. This statement focuses on our supply chain review in these jurisdictions; however, this will expand over time as our policies and processes develop and as our exploration sites become operational.

The supplier base in Egypt is made up of both multinational enterprises and local providers. Our main supplier in Egypt is an energy company. Other significant suppliers include energy providers and various companies supplying us with chemicals, mineral processing services, explosives and extraction, metal parts, mining equipment, technology (Internet of Things) and tyres for vehicles. Our main suppliers in Jersey are servicing the Jersey head office and provide professional services. Top ten suppliers include firms providing consulting, legal, insurance and financial advice, cloud service, as well as geology research.

Employees

We have 2,556 employees and contractors at our main operating asset, the Egyptian Sukari Gold Mine. We strive to apply the highest possible standards in the recruitment and employment of our people.

All workers have freedom of association, we do not use labour brokers.

Our employment policies are currently being updated, modern slavery and human trafficking will be one topic expressly covered by the policies.

Policies

Centamin's commitment to sustainability is set out through a suite of sustainability policies, procedures and management systems. Centamin's policies have been drafted to comply with or exceed the minimum requirements of Egyptian law and to align with the International Finance Corporation Performance Standards. Centamin's Code of Conduct and its policies are available on the Centamin website.

Code of Conduct sets out the standards and principles to which all employees and suppliers are accountable. This includes norms of ethical business behaviour, such as whistle-blowing, conflicts of interest and anti-discrimination. The Code is taught to all employees and contractors as part of induction training. Contravention can lead to disciplinary action and/or termination of employment.

Corporate and Social Responsibility Policy outlines the standards by which the company operates and provides a good corporate citizenship guide for the Group. It compels compliance with all applicable laws and regulations in jurisdictions of operation. All employees are expected to meet the requirements of all applicable standards, to be transparent, ethical, fair and honest in all dealings and to treat individuals with respect. The policy also sets out Centamin's commitment to respect and uphold fundamental human rights and the culture, customs and traditions of those impacted by the Group's activities.

Diversity Policy sets out Centamin's commitment to diversity, Centamin appoints all employees on the basis of merit. However Centamin also recognises that women often face additional challenges in the mining sector, thus we actively encourage women to apply for positions including at management level and as part of succession planning are committed to developing a pipeline of female talent across all countries of operation and at group level. There are also particular challenges in Egypt with restrictions for woman to work in remote locations and carrying out certain activities.

Health, Safety and Environment Policy sets out Centamin's approach to health, safety and the environment. It compels compliance with all relevant local legislation and aligns with both the conditions of Centamin's licences and permits and international best practice standards.

Anti Bribery and Corruption Policy makes it clear that Centamin has zero-tolerance to any form of bribery or corruption. It sets out the processes employees, contractors and company representatives must follow to minimise the risks of bribery and corruption occurring within the value chain. For example, anti-corruption clauses are included in all commercial agreements and extend to any sub-contractor arrangements.

Whistleblower Policy sets out the internal whistleblowing procedures available throughout the organisation. This includes reporting procedures and steps for escalation. Centamin's whistleblowing policy first encourages workers to raise any concerns they may have with their immediate supervisor or a member of site management for first instance investigation and action. Reporting can be escalated to the Board of Directors if initial investigation is unsatisfactory. The policy also includes a non-victimisation provision for all reports made in good faith.

Activity in 2019

A specific **Human Rights Policy** has been developed to be considered by the Sustainability Committee. The policy covers all human rights-related aspects of our business and will expressly cover modern slavery and human trafficking. Like all Centamin policies the forthcoming Human Rights Policy will be global in nature and applicable to all our operational and exploration sites. Compliance with this policy will also be integrated into all supplier agreements, and introduced to our supplier on-boarding programme.

A **Supplier Code of Conduct** has been developed and recommended for approval by the former HSES Committee (now Sustainability Committee). The policy is with the sites procurement and supply team at the Sukari Gold Mine for roll out. Supply chain analysis is in-line with the risk assessment methodology and underway.

Various existing policies have been reviewed and updated to cover the ever increasing importance of sustainability issues in the Centamin business. Thus, by way of an example, the Health, Safety and Environment Policy has been split into two documents:

Health and Safety Policy outlines Centamin's commitment to providing adequate control of health and safety risks arising from its work activities. It compels compliance as a minimum with all applicable legal and regulatory health and safety requirements, as well as applying international industry good practice. The policy sets objectives to ensure the health and safety of its employees, including requirements from senior management and provision for adequate training. Centamin aims for continual improvement in occupational health and safety performance over time; and

Environment Policy sets out Centamin's approach to undertaking its activities in a manner that minimizes the impact of operations on the environment. It compels compliance with all relevant environmental legislation and regulations and aligns with both the conditions of Centamin's licences and permits and international best practice standards. Centamin aims to continually improve its environmental performance overtime and to be transparent in communicating its environmental performance to all of its stakeholders.

The new stakeholder engagement programme and community grievance mechanism in the Sukari Gold Mine Company has been rolled out through the HR department at Sukari (internal grievance) and the security and community committee (external grievance).

A methodology for supply chain risk assessment was developed in 2018/2019. A holistic supply chain human rights risk management process is being developed which will add both due diligence of existing high risk suppliers in the area of human rights once those are identified through our risk assessment process as well as human rights review aspects into our vendor on-boarding policies and on-going supplier review. We are continuing the process of reviewing our supplier contracts with a view of implementing obligations relating to our required standards as well as appropriate remedies.

Effectiveness tracking

External grievance mechanism for the Sukari Gold Mine

We have developed, together with an external adviser, a formal and transparent community Grievance Mechanism for the Sukari gold mine which is being implemented. The grievance mechanism includes modern slavery considerations.

2020 KPIs

- Roll out human rights training programme at Sukari and base line training across the exploration sites
- Analyse all sources of employee engagement to identify any issues early ensuring active and responsive engagement to develop employee led initiatives
- Finalise the supplier human rights risk assessment and address high risk suppliers through in-depth supplier due diligence.

A module of introductory human rights and modern slavery training has been developed and is being rolled out in the Sukari Gold Mine to the General Manager, the Heads of Departments and the Superintendents. This training will be supplemented, once our Human Rights Policy is adopted, by another module which will concentrate on the operationalisation of the Human Rights Policy in our operations as well as in our supply chains.

Centamin PLC Board of Directors approved this statement on 30 June 2020.

For Centamin PLC

****Martin Horgan****

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Martin Horgan

Board Member