



## Anti-Bribery and Anti-Corruption Policy

### Rationale of the Policy

The ethical behaviour of Fresnillo Plc's personnel, in line with our institutional values, is key to achieving the strategic objectives and the sustained growth of Fresnillo Plc; accordingly, and as one of the principal precious metals companies, we strive to maintain a well-established ethical culture, demonstrated through our actions and behaviour. Therefore, all staff must adhere strictly to the applicable laws related to bribery and corruption to which Fresnillo Plc is subject, including, but not limited to, the UK Bribery Act 2010, General Law of Mexico's National Anti-Corruption System and its secondary regulations for the private sector, as well as the Corporate Ethics Code of Mexico's Private Sector Coordinating Council (*Consejo Coordinador Empresarial*), as well as best ethical and transparency practices applicable in Mexico and/or recognized internationally.

### Fresnillo Plc's Policy

This policy applies to employees of Fresnillo Plc and third parties who act in name of or represent Fresnillo Plc.

It is Fresnillo Plc's policy to:

- a) Maintain a zero tolerance position with regard to corruption and bribery in any form and to comply with all the applicable laws related to bribery and corruption to which Fresnillo Plc is subject.
- b) Report all suspicions of bribery and corruption through institutional channels, in particular it is Fresnillo Plc's Policy to provide confidential anonymous and secure whistleblowing hotline "Fresnillo Juega Limpio".
- c) Investigate all accusations of bribery and corruption.
- d) Refrain from doing business with any third parties where there is a concern that the third party may engage in bribery or corruption on behalf of Fresnillo Plc.
- e) Record all transactions in a precise and transparent way in its accounting books and accounts.

Bribery and corruption is defined as:

- Active bribery: Offering, promising or providing a benefit (financial or in-kind) to another person in order to obtain or retain business or an advantage in the conduct of business.
- Passive bribery: Accepting a benefit (financial or in-kind) in exchange for an improper performance of a relevant function or activity

### General Guidelines

#### Strictly prohibited

- To offer and/or accept a bribe or participate in a case of corruption, directly or through a third person.
- Provide payments to accelerate a routine government process (e.g. for permits, customs procedures, etc.), commonly known as "facilitation payments".
- Receive payments or other incentives outside contractual conditions (bribes) from suppliers and contractors in exchange for the setup or extension of a contract.
- Participate consciously in situations that can be perceived as bribery or corruption.

#### Disciplinary Measures

Any employee of Fresnillo Plc who participates in bribery or corruption cases will be subject to with termination of their employment with Fresnillo Plc as established in Article 47 of Mexico's Federal Labour Law ("Ley Federal de Trabajo") and other applicable regulations.

Fresnillo Plc will terminate any existing contract or will not enter in any contractual agreement with a third party where there is a concern that the third party may engage in bribery or corruption on behalf of Fresnillo Plc.

Finally, it is observed that the UK Bribery Act 2010 as well as the Mexico's General Law of Administrative Responsibilities which form part of the National Anti-Corruption System, cover both corporate and individual penalties, including the imprisonment of persons found to be directly involved or complicit in acts of bribery and corruption.

## Guidance and Complaints

In case of any doubts, please contact Fresnillo Plc's Compliance Officer, Risk Manager or Legal Manager at Company headquarters in Mexico City.

In order to report a suspicion or knowledge of bribery or corruption cases, you can use any of the institutional reporting channels depending on which you consider most appropriate:

- Institutional reporting line:
  - "Fresnillo Juega Limpio" through 5 available channels:
    1. E-mail: [reporta@fresnillojuegalimpio.com](mailto:reporta@fresnillojuegalimpio.com)
    2. Web page: <https://www.fresnillojuegalimpio.com>
    3. Free hotline which can be reached from any part of Mexico: 01 800 367 8477
    4. Fax: (55) 52 55 13 22
- Direct report to any of the following:
  - CEO of Fresnillo Plc
  - Compliance Officer
  - Internal Audit Director.
  - Human Resources Assistant VP.
  - Legal Manager.
  - Risk Manager

## References

- UK Bribery Act  
<http://www.justice.gov.uk/publications/bribery-act.htm>
- Mexican Penal Code  
[www.diputados.gob.mx/LeyesBiblio/pdf/9.pdf](http://www.diputados.gob.mx/LeyesBiblio/pdf/9.pdf)
- Corporate Integrity and Ethical Code  
<http://cce.org.mx/ciem/Codigo-de-Integridad-y-etica-Empresarial.pdf>

## Situations of Conflict

The following are examples of areas where there is an increased risk of the perception of bribery or corruption occurring. It is recommended to consult in detail the policies or procedures and / or contact corporate legal management in the case of:

- Accepting or providing gifts.
- Making donations.
- Providing hospitality, travel or entertainment expenses.
- Providing sponsorships.

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