



DPM's Report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

This report has been prepared by Dundee Precious Metals Inc. (DPM) in response to reporting requirements for relevant Canadian companies under Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act (the Act) and has been organized to address each area specified under the Act's reporting requirements.

PART 1: Statement of Commitment

The International Labour Organization (ILO) estimates that in 2021, there were approximately 28 million people around the world working in forced labour situations. That statistic is a grim reminder of the scope of modern slavery, its invasive presence in global supply chains, and the extent of its destructive impact on individual lives and communities.

Companies everywhere share a clear responsibility for reducing and mitigating the risks of forced labour and child labour in their own organizations and supply chains.

For DPM, that responsibility begins with our overarching commitment to human rights, embedded in our corporate values, our Corporate Responsibility Policy, our Code of Business Conduct & Ethics, and our Human Rights Standard, which establishes specific requirements aimed at preventing any form of human rights abuse at our operations or in our supply chain. Those commitments are in turn guided by the standards established in ILO Conventions, the United Nations Guiding Principles on Business and Human Rights and the United Nations Global Compact, and are consistent with (or exceed) the laws, regulations and standards in the countries where we operate.

In 2023, Canada joined other jurisdictions, including Australia, the UK, and the US, in introducing legislation to increase transparency of modern slavery in supply chains by requiring, among other measures, annual reporting.

The following is DPM's first report under the Act, which has been organized to address the information required by section 11 of the Act. It provides a comprehensive account of the policies, programs, and specific actions DPM implemented in the previous year to prevent and reduce the risk of forced labour and child labour in our operations and supply chains – including, among other measures, country and supplier risk assessments, supplier screening, employee training, and providing safe and secure channels for employees, stakeholders, communities, suppliers and their respective workers to report human rights concerns.

We remain committed to open and transparent annual reporting on our approach, progress, and challenges.

DocuSigned by:


David Rae

President and Chief Executive Officer

PART 2: DPM's Corporate Structure, Activities and Supply Chains

DPM is a Canadian-based international gold mining company that is listed on the Toronto Stock Exchange. Our operations and projects are located in Bulgaria, Namibia, Serbia and Ecuador. We operate the Chelopech underground gold-copper mine and the Ada Tepe open pit gold mine, both located in Bulgaria, as well as the Tsumeb specialty smelter located in Namibia.

DPM also owns the Loma Larga project in Ecuador and the Čoka Rakita project in Serbia; and holds interests in a number of other gold development and exploration properties in various locations in Serbia and Ecuador.

We have incorporated principles of responsible business conduct through the adoption of various policies and programs, including our Code of Business Conduct & Ethics, Corporate Responsibility Policy and Human Rights Standard described in further detail below.

In 2022, our global workforce encompassed over 2,000 full time employees and engaged approximately 1,600 contractors. Approximately 75% of our total employees were covered by a collective bargaining agreement.

We monitor the countries where we operate to identify developments that could lead to governance, environmental and social risks, including risks associated with forced labour or child labour.

The countries where we currently operate, Bulgaria and Namibia, along with the countries where we have exploration and/or development projects, Ecuador and Serbia respectively, have different exposures to and potential for forced labour and child labour (as detailed below). Our approach to identifying the parts of our business and supply chain that carry risk of forced labour and child labour, and steps taken to assess and manage that risk, is informed by our country-level and operational-level risk profile assessments. The purpose of these assessments is to identify areas of higher risk; we then use this information to prioritize our efforts in implementing and monitoring a targeted set of controls.

As described below, DPM developed an internal risk-rating of forced labour and child labour based upon a composite assessment of a number of international human rights and modern slavery indices. Based on this risk assessment, we have determined that our current operating assets have a low risk of forced labour and child labour.

However, we acknowledge that risks can also arise in our extended supply chain. As required by the Act, this report describes the measures taken in 2023 to identify, mitigate and eliminate the risks of forced labour and/or child labour at both our operations and within our supply chain.

The mining industry's value chain spans a global complex network. DPM has a diverse global supply chain through which we procure a range of goods and services to support our exploration, mining, processing, transportation and corporate support activities. Our operations' supply chains are primarily locally and/or regionally based. Overall, the majority of the company's goods are procured from suppliers based in Bulgaria, Serbia and Canada respectively. The majority of our supplier spending can be generalized into the procurement of goods, construction, operational and technical services and support and administrative functions. Our risk assessment of forced labour and/or child labour in this supply chain is described in detail in Part 4 of this report.

PART 3: Policies and due diligence processes in relation to forced labor and child labour

Governance

The Sustainability Committee of DPM's Board of Directors provides ongoing oversight of the Company's overall sustainable development activities to ensure the management of the organization's environmental and social impacts. This includes human rights and, specifically, the risks of forced labour and child labour. A core component of the Sustainability Committee's mandate is to provide oversight of potential human rights impacts associated with our operations and in the communities in which we operate. Composed entirely of independent directors, the Sustainability Committee meets quarterly, including an in-camera session without management present at each meeting.

At the executive level, the Senior Vice President (SVP), Sustainable Business Development reports directly to the President and Chief Executive Officer (CEO) and is responsible for sustainability and human rights at the group level. The Director, Sustainability reports directly to the SVP, Sustainable Business Development and leads DPM's overall human rights management strategy, working across the Executive team and Sustainability Directors at each operational site to integrate human rights management throughout the Company's operational and functional areas.

The SVP, European Operations and the Vice President and Managing Director of our Namibian smelter, both of whom report directly to the CEO, have direct oversight and leadership of their site-level teams that manage human rights-related risks throughout their operations and respective supply chains. Similarly, the General Manager of the Company's activities in Ecuador and the General Manager of Exploration, overseeing our Serbian activities, both provide leadership and management of this issue throughout their teams as well.

Policies and due diligence

When we conduct business the right way, we build trust with one another and with all our external stakeholders. Our [Code of Business Conduct and Ethics](#) (Code) is established by the DPM Board of Directors as a statement of the principles and commitments intended to direct and guide the conduct of the Company. The Code sets the expectation that we conduct our business with respect for the human rights of all individuals affected by our business activities. It reflects our values, describes the Company's expectations, and serves as a resource to help guide our decisions. The Code applies to everyone who works for DPM, including employees and members of our Board of Directors, and to third parties, including suppliers working with us or on our behalf, who are contractually required by the Company to comply with the Code. The Code sets the expectation that all third parties (i.e., anyone who does business with DPM, including our suppliers) adhere to principles consistent with those set out in our Code and aligned with our core values. Additionally, our contracts with suppliers include provisions requiring the suppliers to comply with local laws and regulations and applicable professional standards.

Our Code explicitly refers to our [Corporate Responsibility Policy](#) which outlines our commitment to managing the Company's impacts across all areas of our business including, among others, conducting our business in a manner that respects human rights and striving to avoid contributing to adverse human rights impacts, including child and forced labour. The policy further elaborates that DPM, its employees and members of our Board of Directors are expected to understand the Company's impact and influence across the entire value chain and, wherever possible, apply responsible business practices to sourcing and materials stewardship.

To operationalize our policy commitments, we developed a [Human Rights Standard](#) that explicitly outlines the minimum requirements with which all our sites must comply, including requirements regarding forced and child labour. It is informed by the principles contained in the United Nations Guiding Principles on Business and Human Rights, which include guiding principles regarding forced labour and child labour and provide guidance on the following:

- identifying, preventing, mitigating and being accountable for our human rights impacts using a risk-based due diligence approach;
- preventing or mitigating adverse human rights impacts that directly or indirectly arise from our operations;
- processes for the remediation of adverse human rights impacts within our sphere of influence;
- ensuring employees, communities, stakeholders, security providers and third parties (including suppliers) are aware of our commitment to respect human rights and that the Company's business is conducted with respect for human rights; and
- in line with the Company's values and the principles set out in our Code, encourage individuals to report and 'speak-up' when they see something that could result in a violation of, or an adverse impact on, human rights, which encompasses child and forced labour.

Our Human Rights Standard applies to everyone who works for the Company, including all employees and our Board of Directors. It also directly applies to certain third-party suppliers who have contractually committed to complying with our policies and standards and sets the expectation that all third parties (i.e., anyone who does business with DPM, including our suppliers) adhere to principles consistent with those set out in the standard.

To further enable our workforce to live the principles and commitments espoused in our Code, Corporate Responsibility Policy and Human Rights Standard described above, we currently use a comprehensive risk-based third-party due diligence process (3PDD) that was developed to manage bribery, corruption, reputational and sanction compliance risks. In 2023, we modified our 3PDD to include human-rights related due diligence, including forced labour and child labour. The 3PDD process is used as an input to determine the measures we take to engage with our suppliers' compliance with the Code.

PART 4: The parts of DPM's business and supply chain that carry a risk of forced labor or child labour, and the steps taken to assess and mitigate that risk.

Human Rights risk assessment - DPM assets

Throughout 2023, we engaged in risk-based human rights risk assessments across our sites including our operations in Bulgaria and Namibia, development projects in Serbia and Ecuador and our corporate head office in Canada. The results of those assessments allowed us to begin implementing more immediate controls related to child and forced labour in the short-term (such as internal training), while also helping to identify areas of opportunities to further integrate human rights considerations into company processes like our supply chain procurement processes.

In addition to assessing the activities connected to our own operational boundaries, we also conducted a risk assessment of each country where our assets are located to better contextualize and understand the potential risk for human rights impacts and vulnerabilities for forced labour and child labour to occur. Our country-specific assessments also reviewed governance indicators such as the rule of law, political stability, level of corruption and conflict-

affected areas, and environmental factors, including climate change and ecosystem health, which could potentially exacerbate human rights and labour rights issues.

As a result of these assessment activities, we believe the risk for forced labour and child labour within our operations is low.

Human Rights risk assessment -DPM Suppliers

2023 was our first year assessing the human rights risk of our supplier base supporting our operations. The process involved identifying and assessing over 1,900 Tier 1 suppliers, the products and services we procured, classified into 8 broader industry categories, and evaluating each supplier's country of origin risk, across 40 different countries.

As described above, as a result of our assessment of our Tier 1 suppliers we have begun incorporating human-rights related questions, with an emphasis on forced labour and child labour, as a consideration during supplier pre-qualification.

Sector Risk

After conducting a detailed desk-top evaluation of our supplier base¹ which involved referencing credible sources of information about the risks of forced labour and child labour and then subsequently evaluating where our operations and supply chain could be exposed to those risks, we believe that the following sector categories and their associated goods/services could potentially be at a higher risk for forced labour and/or child labour:

Sector and potential related risks for forced/child labour	Goods/Services commonly provided by that sector	Description relevant to DPM
<p><u>Construction Services</u></p> <ul style="list-style-type: none"> - Risk of workers to excessive recruitment fees and debt bondage - Dangerous working conditions with high levels of industrial accidents - Risks of workers being subject to late or non-payment of wages - Restrictions on movement - Restrictions on trade unions and freedom of association 	Drilling, Procurement and Construction Management	Building, maintenance, demolition, renovation and repair of structures
<p><u>Manufacturing</u></p> <ul style="list-style-type: none"> - Hazardous/undesirable work - Vulnerable, easily replaced, and/or low-skilled workforce - Migrant workforce - Presence of labor contractors, recruiters, agents or other middlemen in labor supply chain - Long, complex, and/or non-transparent supply chains 	Electronics, machinery, equipment, spare parts	Manufacturing involves the transformation of raw materials from agriculture, forestry, fishing, and mining or quarrying, as well as the transformation of other manufacturing products into new products.

¹ Based on a review of the United Nations Global Compact: Business and Human Rights Navigator, the International Labor Organization: Global Estimates of Modern Slavery Forced Labour and Forced Marriage 2022, the US Department of Labor: 2022 list of goods produced by child labor or forced labor, the Verité and the U.S. Department of State's Office to Monitor and Combat Trafficking in Persons Responsible Sourcing Tool, and the International Council on Mining and Metals' 2023 Guidance on Human Rights Due Diligence in Supply Chains

High Risk Services - Migrant workforce - Undesirable work - Presence of labor contractors, recruiters, agents or other middlemen in labor supply chain - Debt bondage - Exploitative working conditions - Restrictions on trade unions and freedom of association	Catering, cleaning, security, waste and recycling, maintenance services	Wide range of economic activities, including trade, hospitality, and non-market social and other services.
Transport - Exploitative working conditions - Health and safety issues - Restrictions on trade unions and freedom of association -Hazardous/undesirable work - Vulnerable, easily replaced, and/or low-skilled workforce - Migrant workforce - Presence of labor contractors, recruiters, agents or other middlemen in labor supply chain - Long, complex, and/or non-transparent supply chains	Road and freight services, third party warehousing	Includes transport service workers and warehousing services.
Raw Materials and Commodities supply chain - Exploitative working conditions - Discrimination in the supply chain - Health and safety issues - Restrictions on trade unions and freedom of association - Child labour	Bricks, gravel, cement, lime, steel balls, blasting agents, lubricants, tires, chemical agents	Materials and agents used in our mines production operations and smelter processing

Country of Origin Risk

In addition to evaluating the sector risks, we also assessed the countries of origin of our Tier 1 suppliers for their potential human rights impacts² (which includes but is broader than forced labour and child labour risks). This resulted in an internally developed risk-rating, based upon a composite assessment of a number of international human rights/modern slavery indices listed under footnote 2.

We found that over 70% of our Tier 1 suppliers are located in countries that present a lower inherent risk for human rights violations. Around 29% of our suppliers are located in countries with medium risk for violations and only about 1% of our suppliers are located in countries with a high-risk rating overall.

Country	Overall Human rights risk	% suppliers
Bulgaria	Low	53%
Serbia	Medium	16%
Canada	Low	9%

² A composite qualitative rating based on [Global Slavery Index](#), the [World Bank's Worldwide Governance Indicators](#), the International Labor Organization's database on [Collective Bargaining Rates and Working hours](#) and the [Global Risk Profile's ESG Index](#).

Ecuador	Medium	5%
Namibia	Medium	3%
United States	Low	3%
United Kingdom	Low	3%
South Africa	Medium	2%
Australia	Low	2%
Germany	Low	1%
Netherlands	Low	1%
Others	-	4%

Further to a broader human rights impact evaluation, we also conducted a more focused assessment of the countries of origin of our Tier 1 suppliers for their specific risk for modern slavery based on the Global Slavery Index. We found that over 74% of our Tier 1 suppliers are located in countries that present a lower vulnerability to modern slavery. Around 25% of our suppliers are located in countries with medium vulnerability to modern slavery and only about 1% of our suppliers are located in countries with high vulnerability.

Country	Vulnerability to modern slavery (0-least vulnerable, 100-most vulnerable) ³	% suppliers
Bulgaria	26	53%
Serbia	34	16%
Canada	11	9%
Ecuador	48	5%
Namibia	47	3%
United States	25	3%
United Kingdom	14	3%
South Africa	52	2%
Australia	7	2%
Germany	11	1%
Netherlands	6	1%
Others	-	4%

PART 5: Measures taken to remediate instances of forced labor or child labor, including measures taken to compensate vulnerable families for any loss of income.

³ Source: [Global Slavery Index](#)

Access to Remedy

We have several outlets for employees, stakeholders, communities, suppliers and workers in the extended supply chain to report concerns and access remedies around human rights, including those around the risks of forced labour and child labour.

We have created a Speak Up process, including an EthicsPoint hotline operated by an independent third-party, which is a publicly available mechanism to report any unethical behaviour, including human rights violations. In addition, across our sites, we also have implemented grievance mechanisms accessible to our stakeholders and communities so that we may receive and address complaints or grievances in an expedited and transparent manner. These processes are available for workers in our extended supply chain to report on risks associated with forced labour and child labour and are publicly available on our website for everyone to utilize.

We have four reporting channels as part of the Speak-Up process, including the EthicsPoint hotline, which allows for anonymous reporting of misconduct and ethical concerns. Reports submitted through the hotline are referred to the Corporate Compliance Officer (except when the Corporate Compliance Officer is personally implicated or the reports implicate a member of the Executive team or a member of Board of Directors, in which case the report is appropriately escalated) and to the appropriate Board Committee Chair, depending on the nature of the report. The Board receives quarterly updates on Speak-Up reports received and the status of investigations, if any, and Committee Chairs discuss the reports at their respective meetings. The Code includes protection from retaliation for anyone who files a report, raises a concern, or participates in an investigation in good faith.

For performance reporting on our Speak-Up reports, please see more in our [2022 Sustainability Report](#).

At the site level, we have also provided a local grievance mechanism to receive human rights grievances with the intention of transparent and expeditious resolution and a commitment to non-retaliation against anyone who submits a complaint.

The Company did not receive any grievances related to forced labour or child labour and has not changed its business relationships as a result of our due diligence efforts relating to forced labour or child labour in 2023 and as such, has no measures to report with respect to remediation.

PART 6: Modern slavery awareness training compliance for employees

Our Human Rights Standard includes providing human rights training at all our sites. Although our employees receive training in good governance practices (such as anti-bribery, anti-corruption, and workplace harassment) that are associated with preventing and mitigating human rights risks, we recognize that we need to provide more updated training across our operations to specifically address the risks of forced labour and child labour in our supply chains.

Using our risk-based approach (as described above), in 2023, we identified the increased potential for human rights risks to occur at our development project in Ecuador. As such, we engaged an independent, internationally recognized third party to conduct in-person, participatory and comprehensive human rights training. A full day of training focused on the Voluntary Principles for Security and Human Rights for our security personnel followed by a second day of training focused on overall human rights identification and mitigation, with an

emphasis on modern slavery and scenarios around the use of child labour and forced labour. This second day of training was provided to our management teams and key personnel in stakeholder relations, supply chain, human resources, sustainability and finance.

PART 7: How DPM assesses its effectiveness in ensuring that forced and child labor are not being used across its business and supply chains

Effectiveness

Our EthicsPoint hotline and grievance mechanisms provide a forum to receive issues related to actual and/or perceived human rights impacts amongst our employees, communities and supplier base. Beginning with our 2022 Sustainability Report, we have started to publish the number of and types of complaints we have received, which we will continue to report in our bi-annual sustainability reporting. This provides us with an avenue to track and communicate our performance on the risks of forced labour and child labour. Progress in this area will be publicly reported during our next report under the Act to be submitted in 2025, with further details to be provided in our bi-annual sustainability report, also to be published in 2025.

PART 8: Board of Directors' Approval

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Peter Gillin, Chair, Board of Directors
February 14, 2024



Signature

“I have the authority to bind Dundee Precious Metals, Inc.”