



PRIMERO

CONFLICT OF INTEREST POLICY

PURPOSE

Primero is committed to conducting business and delivering services in a fair, transparent, accountable and impartial manner. This Conflict of Interest Policy deals with situations in which our employees may have an actual, perceived or potential conflict of interest between their role in Primero and their personal interests.

This policy outlines a framework for employees and relevant persons to identify, disclose, manage and monitor conflicts of interest.

OUR AIM

It is important that any actual, perceived or potential conflict of interest is identified, disclosed and effectively managed (including avoided if possible). Management of conflicts of interest must be fair, transparent, accountable and free from bias. Persons to whom this policy applies must:

- Disclose any actual, perceived or potential conflict of interest;
- Seek advice about how a conflict will be managed; and
- Are encouraged to report any actual, perceived or potential conflict of interest that they observe.

COMMITMENT TO OUR CLIENTS

This policy applies to all Primero personnel, and their subsidiaries working across all projects and operations at all times.

The Board of Directors commits to ensuring this policy is enforced and communicated to the workforce.

Cameron Henry
Director

Dean Ercegovic
Director

Brett Grosvenor
Director