

## BUSINESS INTEGRITY & SOCIAL RESPONSIBILITY POLICY

### PURPOSE

Primero is committed to the goal of upholding business integrity and social responsibility by integrating and balancing social and economic considerations in our governance and decision making.

We support a culture of honesty and trust in all management and business practices. We are committed to acting in good faith and exercise due care in all we do; to comply with relevant legislation and regulations, proactively promote ethical behavior and Primero values of accountability, efficiency and integrity.

### OUR AIM

- To comply with all applicable legislation and regulations relevant to our industry and particular activities;
- To act with integrity in dealing with all persons inside and outside Primero;
- To disclose any actual, perceived or potential conflict of interest;
- To follow established standards in contracting and treat all stakeholders fairly and equally;
- To work hard to build and maintain relationships with contractors and clients;
- Commit to a zero approach to bribery and corruption and ensure that no person give to, or accept from, a business or associate, any material or gift considered 'extravagant';
- Ensure there is no discrimination based on gender, physical or mental disability, age, sexual orientation, race or religious belief; and
- To maintain a workplace free from intimidation, coercion, harassment and commit to treating all employees with dignity and respect.

### COMMITMENT TO OUR CLIENTS

This policy applies to all Primero personnel, across all projects and operations at all times. The Board of Directors commits to this policy and ensures these principles are applied to their relationships with other companies and employees.



**Mark Connelly**  
Non-Executive Chairman



**Cameron Henry**  
Managing Director



**Dean Ercegovic**  
Executive Director



**Brett Grosvenor**  
Executive Director