



F O R T U N A
S I L V E R M I N E S I N C.

**Fortuna Silver Mines Inc.
("Fortuna")**

HUMAN RIGHTS POLICY

Policy Statement

Fortuna Silver Mines Inc. and its subsidiaries ("Fortuna") are committed to respecting human rights, which is understood as the fundamental rights and freedoms in the International Bill of Human Rights and the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. We recognize that mining activities and business relationships could be responsible for creating potential risks and impacts to human rights. We therefore strive to manage risks, maximize positive impacts, and reduce negative impacts. Human Rights and Ethics is a pillar of our Sustainability Framework. This policy aims to ensure that we respect human rights and prevent or mitigate any violations, in alignment with the UN Guiding Principles on Business and Human Rights.

Our Approach

To this end, we expect all directors, officers, employees and suppliers to uphold Fortuna's commitment to:

- Respect the human rights of employees, contractors, and local communities, comply with all applicable laws, regulations, and standards, and, where possible, exceed these requirements by implementing recognized industry best practices;
- Treat everyone with whom we come into contact with fairness, respect, and dignity and conduct our business in a way that respects the rights of all people. Fortuna will:
 - Support the elimination of all forms of forced, compulsory and child labour, in our direct business activities, through our business relationships, and in our supply chain;
 - Uphold employees' and contractors' right to fair wages and compensation for labour, their rights to a safe workplace, free from discrimination, harassment, intimidation, or retaliation, and their rights to freedom of association and to collective bargaining;
 - Respect the right to water, health and an adequate standard of living, particularly in the case of involuntary physical and economic displacement or resettlement;
 - Respect the right to security of person, and ensuring, through policies, standards, management systems and training, that security providers understand and meet their responsibility to respect human rights, in accordance with the Voluntary Principles on Security and Human Rights;
- Integrate our commitment to respect human rights into all aspects of our business, to ensure proper assessment, monitoring, and management of risks and the remediation of negative impacts related to our activities and business relationships, in alignment with the United Nations Resolution: "Basic Principles and Guidelines on the Right to a Remedy and Reparation for Victims of Gross Violations of International Human Rights Law and Serious Violations of International Humanitarian Law";
- Avoid causing or contributing to adverse human rights impacts within our operations and supply chain, minimize and mitigate impacts where we can, and enable the remediation of any such impacts which our activities cause or contribute to;
- Perform reasonable due diligence on relevant suppliers and third-party service providers to ensure their respect for human rights and implementation of relevant policies and processes;

- Maintain accessible, effective, transparent, timely, and trusted requests and grievances procedures for internal and external stakeholders and provide equitable remedies as applicable;
- Seek continuous improvement of our human rights practices and performance through assessment, due diligence, monitoring, audits and inspections, incident and complaint investigations, and by seeking constructive dialogues and/or partnerships with stakeholders and rights-holders; and
- Respect local traditions, knowledge, and cultural/spiritual heritage including the ILO Indigenous and Tribal Peoples Convention, and strive to align with the UN Declaration on the Rights of Indigenous Peoples and the principle of Free, Prior and Informed Consent, as defined in relevant jurisdictions, to the greatest degree possible before proceeding with new project development, where impacts to Indigenous Rights may occur.

Training and Communication

We use awareness and training programs, including for all employees, officers and directors, to ensure that our internal and external stakeholders understand and actively support this Policy and its expectations. We include this Policy in our Environment, Social and Governance training sessions. We maintain a current copy of this Policy on the Fortuna website, making it available to all directors, officers, employees, suppliers and other stakeholders.

Monitoring and Reporting

We continually review human rights legislation, regulations and standards in the jurisdictions in which we operate to ensure Fortuna’s alignment. We develop and implement supporting policies, procedures, and internal reporting structures to embed this Policy throughout Fortuna. We report our performance publicly through reporting initiatives.

We expect all directors, officers, employees, and suppliers to take steps to prevent any violation of this Policy. This includes the timely identification and reporting of both incidents and potential issues before they escalate, and to seek additional guidance when necessary.

Any person who becomes aware of a violation of this Policy must promptly report the matter to their immediate supervisor/manager; if that is not possible, to the Senior Vice President, Sustainability; or, anonymously, through the Whistleblower website at <http://fortuna.ethicspoint.com>. Officers and directors must report violations to the Senior Vice President, Sustainability. If an employee or supplier reports the matter to their immediate supervisor/manager, that supervisor/manager must promptly communicate the information to the Senior Vice President, Sustainability, who will determine the most appropriate method to investigate and monitor progress, until the matter has been satisfactorily resolved. The Sustainability Committee appointed by the board of directors of Fortuna (the “**Board**”) assists in fulfilling its oversight responsibilities related to this Policy and to ensure its appropriate monitoring.

Any person who raises genuine concerns will not be subject to retaliation or disciplinary action. Fortuna strictly prohibits retaliation by anyone as a consequence of making a good faith report of a possible violation of the law or this Policy. Retaliation or reprisal will result in disciplinary action, including termination.

Questions

Any questions regarding this Policy should be directed to the Senior Vice President, Sustainability of Fortuna.

Changes to this Policy

Fortuna reserves the right, at its absolute discretion, to change this Policy from time to time as it considers necessary.

This Human Rights Policy was adopted by the Board on March 8, 2023.