

**FORTUNA SILVER MINES INC.**  
(the "Company")

**HUMAN RIGHTS POLICY**

**Policy Statement**

Fortuna Silver Mines Inc. and all its subsidiaries ("**Fortuna**") are committed to respecting the human rights of all individuals impacted by our operations, including employees, contractors, the communities in which we operate and other external stakeholders. We expect our suppliers and business partners to share this commitment and to implement policies and procedures that support respect for human rights.

We do not tolerate forced and bonded labor, child labor and unfair discrimination. We recognize the right to freedom of association and collective bargaining and the right to equal remuneration for equal work.

Our human rights principles are embedded in a number of our internal procedures, business systems and processes, including those related to employment practices, environmental practices, security, anti-corruption practices, and community and social relations guidelines. This Policy should also be read in conjunction with Fortuna's Anti-Corruption Policy and our Code of Business Conduct and Ethics and Whistle-Blower Policy, as well as our other applicable policies and procedures.

We recognize our responsibility to respect human rights in all of our operations wherever we operate. Our approach to human rights is based on the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights. While governments have the primary responsibility to protect and uphold human rights, we recognize our responsibility to respect human rights.

**Our Approach**

In order to fulfil our commitment to respecting human rights, we are committed to strive to:

- uphold and respect the protection of internationally proclaimed human rights;
- seek continual improvement in our human rights practices and performance;
- respect the rights of our workforce, members of our local communities and other stakeholders who may be impacted by our business activities;
- respect our workers' rights to freedom of association, equal opportunity, freedom from discrimination, peaceful protests and assembly and collective bargaining;
- not discriminate against any individual on the basis of race, colour, religion, gender, sexual orientation, nationality, ethnic origin, social status, marital status, disability or age, or on the basis of any other personal characteristics protected by law;
- respect the rights and dignity of all employees and not allow forced or compulsory labour contrary to ILO Forced Labour Convention 29, or child labor contrary to ILO Minimum Age Convention 138;

- provide competitive compensation and benefits programs compared to local, regional or national markets;
- respect the rights of local and indigenous communities near our operations by proactively seeking, engaging and supporting meaningful dialogue about our operations;
- seek continuous improvement in upholding and respecting human rights through ongoing dialogue with external stakeholders;
- contribute to the health, education and economic well-being of surrounding communities;
- anticipate and avoid, or where avoidance is not possible minimize adverse social and economic impacts, including resettlement, from land acquisition or restrictions on land use by (i) providing compensation for loss of assets and (ii) ensuring that resettlement activities are implemented with appropriate disclosure of information, consultation, and the informed participation of those affected;
- maintain the safety and security of our employees and operations within an operating framework that encourages respect for human rights and fundamental freedoms. In relation to the interaction with public and private security providers and local communities, we observe and support the Voluntary Principles on Security and Human Rights;
- respect the rights of members of our local communities and other stakeholders who may be impacted by our business activities to sufficient, safe, acceptable, physically accessible and affordable water for personal and domestic uses. We continually monitor and assess the impact of our operations on our stakeholders' access to water and their quality of water;
- not tolerate disrespectful or inappropriate behaviour, harassment, intimidation or unfair treatment, or retaliation of any kind by our employees or those of our suppliers and business partners;
- incorporate ongoing human rights due diligence and into relevant business processes as appropriate;
- require that all suppliers and contractors comply with all national laws pertaining to human rights and abide by the terms of this Policy. We will take appropriate action and terminate our relationships with any suppliers or contractors who fail to do so;
- perform reasonable due diligence on relevant suppliers and third-party service providers to require that human rights terms and conditions be included in contracts; and
- collaborate with or provide access to remedy through effective complaints and grievances procedures.

### **Training and Communication**

The Company will provide a copy of the current version of this Policy to new Employees when they are hired or contracted and will provide copies of significant changes as necessary.

We will include human rights information and provide training on our human rights expectations in our annual Ethics training sessions.

### **Monitoring and Reporting**

We will continually review and evaluate changing human rights conditions in the jurisdictions in which we operate.

We will develop and implement supporting policies, procedures, training and internal reporting structures to embed this Policy throughout the Company.

The Company expects all Employees to take steps to prevent any violation of this Policy. This includes identifying and raising potential issues before they lead to problems and seeking additional guidance when necessary.

Employees who become aware of a violation of this Policy must report the matter to their immediate supervisor/manager, or alternatively anonymously through the Whistleblower website at <http://fortuna.ethicspoint.com> as soon as possible. If an Employee reports the matter to their immediate supervisor/manager, that supervisor/manager must immediately communicate the information to the Human Resources Manager who will determine the most appropriate method to investigate the substance of the claims and ensure that there is appropriate monitoring of progress until the matter has been satisfactorily resolved.

Employees who raise genuine concerns will not be subject to retaliation or disciplinary action. Retaliation by anyone as a consequence of making a good faith report of a possible violation of the law or this Policy is strictly prohibited and will result in disciplinary action, including termination.

We will make our human rights performance available to the public through annual reporting initiatives.

### **Questions**

Any questions regarding this Policy should be directed to the Chief Compliance Officer 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 Policy was approved by the Board on March 11, 2021.