

# Integrity and compliance risk management

By preventing, detecting, and mitigating integrity and compliance risks, we earn the trust of our stakeholders and ensure the success of our business. Our program consists of three lines of defense:

**First line:** Supported by areas responsible for processes, controls, and technology, and focused on daily operations to avoid incidents and guarantee compliance with current laws and regulations.

**Second line:** Includes oversight, reporting, and indicators from comptrollers, risk management, the Compliance and Legal Affairs Departments, among others.

**Third line:** Represented by the internal audit area, which provides independent assurance to the audit committee and management team regarding risk mitigation, control effectiveness and efficiency, and corporate governance.

We conducted national and international compliance assessments as a way to promote best practices in Peñoles and Fresnillo. Based on the 2022 third-party verification of Fresnillo plc's anti-bribery and corruption program—which considered the requirements established by the UK Bribery Act regulation, as well as Mexican regulation—an action

plan was drawn up to implement in both companies the improvements identified in the processes that carry the greatest risk. As a result, in 2023, we updated procedures for entering into project and service contracts, procurement, due diligence, and financial transactions to prevent bribery and corruption, and in 2024, a training plan for these areas will be deployed.

