

# Electronic Monitoring and Transparency Policy

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## INTRODUCTION

This Electronic Monitoring Transparency Policy (the “Policy”) is intended to identify the circumstances in which Franco-Nevada Corporation (collectively with its subsidiaries, “Franco-Nevada”) engages, or may engage, in electronic monitoring of its employees, directly or indirectly, and the purposes for which the information obtained through the electronic monitoring may be used. This Policy is intended to be read in conjunction with and supplement Franco-Nevada’s Information Security Policy.

This Policy does not establish a right for employees not to be electronically monitored, nor does it create any new privacy rights for employees.

## HOW AND IN WHAT CIRCUMSTANCES ELECTRONIC MONITORING OCCURS

Electronic monitoring includes all forms of monitoring of employees that is done electronically throughout the workplace, directly or indirectly, whether continuously, episodically, or on an as-needed basis. Franco-Nevada reserves the right to electronically monitor employees, directly or indirectly, at its discretion. Employees should not expect absolute privacy in relation to their use of Franco-Nevada’s information assets and resources including, but not limited to, software, e-mail, and internet access, including employees’ use of personal electronic devices when accessing the same, and should not assume that any use of Franco-Nevada resources is exempt from electronic monitoring in accordance with this Policy.

As of the date of this Policy, electronic monitoring may be performed directly or indirectly, whether continuously, episodically, or on an as-needed basis, through any electronic devices (e.g. laptops, cell phones, etc.) provided or paid for by Franco-Nevada to employees as well as through any electronic devices (personal or otherwise) that employees use to access Franco-Nevada’s information assets and resources. Franco-Nevada’s current practice is to review operating system information of devices accessing Franco-Nevada’s information assets and resources to assess for cybersecurity risks; however, the description of how and in what circumstances Franco-Nevada conducts electronic monitoring is not static and may be updated as policies, practices, and procedures change, or as assets, systems, services, equipment, and devices, are upgraded or replaced.

## HOW INFORMATION OBTAINED THROUGH ELECTRONIC MONITORING MAY BE USED

Information obtained through electronic monitoring may be used for purposes that include, but are not limited to, employee safety, the protection and security of Franco-Nevada’s resources (e.g. for cybersecurity and patching/security update purposes), and monitoring employee compliance with applicable policies and procedures.

## ADMINISTRATION OF THE POLICY

### OVERSIGHT AND CHANGES

The Audit and Risk Committee of Franco-Nevada Corporation’s Board of Directors shall oversee and will review this Policy annually to ensure that it is effective in achieving its objectives and may recommend changes to such objectives or this Policy, or may recommend additional objectives, as appropriate.

## RESPONSIBLE OFFICERS

The Chief Financial Officer has been designated as the individual responsible to oversee this Policy. The Chief Financial Officer shall be responsible for:

- establishing and maintaining the practices and procedures necessary to implement this Policy and monitor compliance with its provisions; and
- disseminating this Policy to all Franco-Nevada personnel.

## DATE

Adopted on March 15, 2023 with effect from March 1, 2023. This Policy supersedes any written or oral representations that are in any way inconsistent with it.