

CODE OF ETHICS AND CONDUCT



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Code of Ethics and Conduct

Conduct and integrity are the key to our success

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MESSAGE FROM THE CEO

Dear friends and collaborators:

The main legacy that Breca Corporate Group's shareholders, directors, general managers and corporate officers passed on to us is a flawless model of behavior and conduct that governs all employees as well as the activities and processes of the Group's companies, including Minsur and its subsidiaries.

Sustainability is the cornerstone of our business strategy and philosophy; it is the basis of all our policies and guidelines and requires a permanent commitment and compliance from all our collaborators, suppliers, and contractors.

In order to build a culture of compliance, aligned to our corporate values, we have updated our Code of Ethics and Conduct; considering the best practices identified in the market and in society.

This Code of Ethics and Conduct is a tool for consultation and reference; it is the compass

that shall guide us and be the common thread that runs through our daily work to ensure compliance with our values, standards and policies, both as a company and as individuals who are part of it.

This set of standards and guidelines is a mandatory guide for everyone, with no exceptions, and regardless of their hierarchy within Minsur and its subsidiaries.

We are sure these guidelines will be met with the same responsibility, commitment and accuracy that characterizes the work of all Minsur's and its subsidiaries' collaborators, suppliers, and strategic partners.

I invite you to review in detail our Code of Ethics and Conduct, to take it in and to make it the guide for all our actions and decisions. Doing so is our responsibility, as well as that of all Minsur's and its subsidiaries' collaborators.



Juan Luis Kruger
CEO of Minsur



1. OUR MISSION

Generate value by transforming mineral resources in a sustainable manner.

2. OUR VISION

Develop and operate world-class mining assets, as a benchmark in terms of safety, operational efficiency, socio-environmental responsibility, and people development.

3. OUR VALUES

Minsur's culture is based on a set of values that aim at bringing together, joining and guiding all our company's members. Thus, we intend that our collaborators' thoughts and actions use them as their North Star, becoming the center of Minsur and its activities.



4. ON OUR CODE OF ETHICS AND CONDUCT

This Code applies to all Minsur employees, regardless of their position, geographic location, or level of responsibility.

Likewise, it applies to our customers, suppliers and third parties doing business with us or on behalf of Minsur.

5. ON THE ROLE OF MINSUR'S COLLABORATORS

All Minsur employees must act with integrity and respect the applicable legal framework into force, as well as abide by the provisions of this Code and the Corporate Compliance System. Likewise, they must annually renew their commitment to and understanding of these guidelines and provisions.

If any doubts, concerns, complaints or claims arise, collaborators may contact Minsur's Integrity Channel, which is in charge of promptly take the most suitable measures.

6. ADDITIONAL LEADERSHIP RESPONSIBILITIES

In the event that you have a supervisory position –or a position of trust, or you have staff reporting to you– the level of responsibility and compliance with this Code is even higher than that of other collaborators. This is because leaders will have the special responsibility of guiding their subordinates with integrity, setting an example every day, and positively influencing their teams, promoting ethical conduct and complying with legal and internal provisions:

Ensure that your work team fully complies with the Code

Be an example to follow, showing consistency between words and actions

Promote and ensure participation in training programs to better understand the Code

Recognize and encourage employees to abide by the values and principles set forth in this Code

Foster an environment of trust and communication, enabling collaborators and stakeholders to express their questions and concerns in an open dialogue

Report grievances, complaints, claims and ethical concerns or any possible human rights violations through the established channel

Respond to any breaches of this Code, preventing similar situations from being repeated in the future

7. DIVERSITY, EQUAL OPPORTUNITIES AND RESPECT

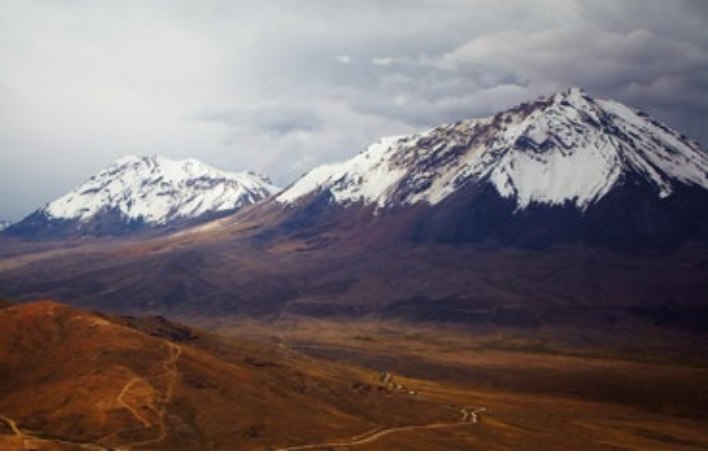
- Offer an environment of cultural plurality and diversity that allows employees to work with equal opportunities, respect, dignity, justice, and courtesy.
- Assess the divergent perspectives of collaborators, as well as those who question their points of view.
- Promote an environment of respect, in which any act of harassment, sexual harassment, as well as any hostilities at work are openly and categorically rejected, inside and outside Minsur's offices and facilities.
- Employees shall treat their co-workers and job applicants with respect, and must not discriminate on the basis of race, color, sex, origin, language, religion, sexual orientation, disability, political preferences or any other.
- Cultivate and foster a team spirit, in order to build relationships based on trust, with the certainty that the collaborator is committed personally and professionally to doing the right thing.
- Respect the workplace and employees, upholding Minsur's reputation and good image.
- Promote a workplace that respects the fundamental rights of employees, both individually and as union groups. This translates into complying with current labor laws and regulations, as well as respecting the different opinions of collaborators.
- Promote the professional growth of employees through continuous learning. This includes promoting practices recognizing and rewarding job performance and merits.
- Listen to collaborators through open and honest communication.
- Promote a fair work environment, without bias. If there is the possibility of hiring a relative of any collaborators, the responsible area must be informed and request approval to avoid any potential conflicts of interest.

8. FREEDOM OF ASSOCIATION AND UNION ACTIVITY

- Respect the employees' freedom of association, recognizing that everyone has the right to belong to a trade union and to participate in collective bargaining.
- Participation in Trade Unions must observe the company's values of Integrity and Responsibility, considering that, above all, the employee is part of Minsur and abides by its values.
- If an employee belongs to a union, they are expected to always tell the truth and refrain from spreading gossip or rumors to favor union interests.
- All employees who belong to a union and participate in a strike must do so in accordance with the Collective Employment Relations Act, which defines a strike as follows:

"A strike is the voluntary suspension of work collectively agreed upon and carried out voluntarily and peacefully by the employees, with the abandonment of their workplace"





- › The indefinite stoppage with the permanence of collaborators in the workplace, obstructing employees' entry to the work center, or intentionally reducing production to the detriment of the company, are not recognized or accepted forms of strike or protest.

9. SAFE AND HEALTHY ENVIRONMENT

- › For us, Safety is one of the most important values: if it is not possible to work safely, activities must stop. In this sense, the life and integrity of people is the greatest value, thus we promote a culture of safety based on prevention.
- › Likewise, the healthiest work environment and conditions must be ensured for employees, contractors, and visitors. No production goals, cost, timesaving, or any other competitive advantage, justifies putting people's health and physical integrity at risk.
- › The use, possession or sale of drugs shall not be allowed under any circumstances. Likewise, consumption of alcohol in the company's facilities or entering under the direct or indirect influence of alcohol, or of drugs that impair the capacity and normal performance of the employee, shall not be accepted.
- › Visitors will be provided and required to take the necessary health and safety measures, in addition to monitoring their compliance with these at the facilities.
- › Fulfillment with these standards will be promoted, sharing them with suppliers and customers.
- › Quick action will be taken whenever risks or incidents are reported to allow timely and necessary decisions to be made.



10. TRANSPARENCY AND INTEGRITY IN OUR ACTIONS

- › At Minsur, the company's resources and assets will be cared for and used responsibly, honestly, efficiently, and appropriately.
- › Our collaborators shall use electronic means and communication systems exclusively to fulfill their duties.
- › Minsur employees will not be allowed to carry out any work activity that is detrimental or incompatible with the interests of the company.
- › Under no circumstances will Minsur's assets be used for illegal, harmful, or offensive purposes towards Minsur or third parties.
- › The services of Minsur's suppliers or contractors will not be illegitimately used for their own benefit.
- › Travel allowances allocated to employees for travel and representation expenses must be used responsibly and appropriately. Likewise, expenses shall be reported in an accurate, complete, and reliable manner, collaborating openly during the corresponding review processes.
- › Collaborators must declare any conflicts of interest that may arise when carrying out their work, whether potential, real, or apparent. To achieve this, commitments and relationships will be carefully evaluated, to ensure transparency and loyalty to Minsur and its shareholders.
- › Under no circumstances will any of our collaborators take advantage of opportunities that arise both when carrying out their duties and when using Minsur's resources for personal enrichment purposes.
- › Gifts or hospitality may not be given or received with the intention of improperly influencing the decisions of the recipient, against legal regulations or Minsur policies. If there is any type of conflict of interest, the fact will be reported directly to Human Resources and, in case of doubt, it will be consulted through the channels provided by the company.
- › Recognized as a shaper of public opinion, Minsur will respect the freedom of speech and the free press and free media. Likewise, we shall have a transparent relationship with the media, and respect their autonomy. Furthermore, timely, effective, truthful, and consistent information shall be given to the press, through the formal channels established for such purpose.
- › The link with the media shall only be established through official spokespersons designated by Minsur. Similarly, employees will need explicit authorization to become spokespersons for the company and address the press or the media, through either official channels and/or social networks.

11. RESPONSIBLE USE OF POWERS CONFERRED

- › Minsur values the freedom of thought, and protects the trust placed in us. Therefore, there is a commitment to act and make the best decisions for Minsur and for its employees, suppliers, and the environment, through ethical behavior and pursuant to the law.
- › For this reason, Minsur's internal rules - policies, procedures, controls, among others - shall be respected and, even more, they shall be complied with, contributing to its continuous improvement over time.
- › Reputation is one of the most important assets for Minsur. Therefore, we intend to fulfill the company's ethical, taking appropriate precautions to prevent risks and punish irregular acts.
- › Professionalism and objectivity guide the work activities of Minsur collaborators, which will allow identifying and timely reporting those activities - of collaborators or third parties - that could damage the image of the company.

- › Minsur has a procedure to be followed in response to critical situations, which is based on direct consultation with related areas, respecting the internal hierarchy of the company and reducing response time.

12. INTEGRITY OF FINANCIAL, OPERATIONAL AND SUSTAINABILITY REPORTS

Accurate, truthful, timely and appropriate information will be delivered to the State and regulatory bodies	Care will be taken to ensure that there is a timely, complete, correct, and accurate record of transactions and operational activities. This will allow giving relevant information for reporting and decision-making processes.
There is a commitment to deliver on time those reports - financial, social, environmental or others - that fully, transparently, and truthfully reflect the Minsur's situation. Because the trust of our stakeholders deserves to be rewarded with our company's transparency	Appropriate measures are in place to preserve and secure Minsur records.
	There is no justification for deliberately recording false, misleading or confusing information

13. PROTECTION OF CLASSIFIED INFORMATION AND INTELLECTUAL PROPERTY

- › It is Minsur's priority to protect the personal and confidential information of its collaborators, customers or third parties. Likewise, it is the duty of collaborators to protect the company's confidential and privileged information, which they have access to. In the event that the employment or commercial relationship ended, such information shall be handled pursuant to the law and our current corporate policies.
 - › The company contributes to the strengthening of competitive, fair, and open financial markets, by timely and transparently disclosing relevant information.
 - › Inside information shall not be used for purposes other than those of Minsur, in no case for personal or third-party benefit.
 - › All Minsur's proprietary rights, as well as its intellectual capital, are guaranteed.
- Likewise, all information and / or materials are protected from being reproduced and / or distributed through printed or electronic means, respecting the confidentiality provisions under the corresponding agreements.
- › Minsur's identity signs and symbols shall be used correctly and consistently, as they are the reflection of those who are part of the company and of the company's internal culture.
 - › All documents produced, originated, provided, and obtained while working at Minsur, shall be kept confidential and under strict reserve, without putting the company's safety or its interests at risk.
 - › Minsur reserves the exclusive right to disclose its intellectual capital to third parties.



14. RESPONSIBLE REPRESENTATION OF MINSUR AND STRENGTHENING OF REPUTATION

- › We will contribute responsibly and proactively to the good image and reputation of Minsur. For this purpose, it is important for collaborators not to confuse any actions they carry out in a personal capacity with those they carry out on behalf of Minsur.
- › The representation of the company is exercised in accordance with the powers granted and exclusively for the needs of the collaborator's job and duties. Its exercise is carried out in accordance with Minsur's corporate policies, procedures, and standards.
- › If Minsur representatives are awarded in their work activities, they must act accordingly: always maintaining a professional attitude.

15. RELATIONSHIP WITH OUR CUSTOMERS

We are upright professionals; we always act ethically, generating transparent and trusting relationships, maintaining, and strengthening ties with our customers	The trust and loyalty of our customers is a priority for us. In that sense, transparency in negotiations is Minsur's best letter of introduction, which is framed within our commercial policy
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16. RELATIONSHIP WITH OUR SUPPLIERS

- › Minsur's suppliers are the cornerstone of the company's objectives and its achievements. Such recognition only shows that the negotiation, selection and exchange processes with them have been truthful, fair, and careful.
 - › There are clear and thoughtful technical criteria for the selection of our suppliers. Furthermore, they shall meet professional and ethical standards adjusted to Minsur's needs, measured with objective factors.
 - › All suppliers may participate in different selection processes, under the same conditions and opportunities. Both merit and qualifications will be important when evaluating their proposals.
- This process is carried out with no bias or discrimination based on race, religion, nationality, gender, sexual orientation, identity, age, or disability.
- › Suppliers, contractors, and all those who are part of Minsur's stakeholders deserve the same respect and dignified treatment. Therefore, we fully abide by our promises, commitments, agreements, and contracts.
 - › At Minsur, we recognize suppliers who perform with excellence, maintain high environmental standards, and create relationships of trust in dealing with communities. With them, we seek to consolidate the same vision of sustainability in all their practices.

17. INTEGRITY IN THE MARKET

Minsur is committed to demanding that third parties (partners, strategic allies, agents, suppliers, etc.) who represent the company in the public and private spheres understand and comply with the company's ethical guidelines and internal policies.

Trust, truthfulness, and mutual respect are the basis of Minsur's relationships with its strategic partners and allies. This helps strengthening the our bond in the long term and we all achieve sustained benefits.

Any acts preventing free competition in the markets in which we compete is rejected. Minsur is committed to active and honest competition, under market ethical principles and legal standards.

18. GOOD RELATIONSHIPS AND INVESTMENT IN OUR COMMUNITIES

- › The points of view and expectations of all stakeholders are valued and considered during the decision-making process.
- › Ethnic, religious, and cultural diversity is respected by Minsur, as are the customs, traditions, principles, and values of the communities with which it interacts.
- › It is Minsur's commitment to contribute to the sustainable development of the communities in the areas where it operates, acting in a transparent and socially responsible manner.

19. INDIGENOUS AND NATIVE POPULATIONS

- › Minsur employees respect the customs and traditions of indigenous and native peoples, and value their members. In addition, our suppliers also adhere to that respect.
- › The special connection of indigenous people and the local community with the land and water is recognized and valued by Minsur. For this reason, the company will seek mutually beneficial agreements with the communities, as it recognizes them as part of the development and execution of mining operations.

- › In relation to operations or major new capital projects located on lands traditionally owned or occupied by indigenous people, Minsur will comply with the ICMM Position Statement on Indigenous People and Mining. To do this, it shall complete the host government's regulatory processes and comply with national laws that are consistent with the ICMM Position Statement's objectives.

20. ENVIRONMENTAL PROTECTION

- › The company is committed to the development of environmentally sustainable activities, complying with the laws and regulations applicable to our operations.
- › Furthermore, the efficient use of natural and productive resources shall be promoted, with special emphasis on the culture of protection, respect, and care for the environment, recognizing biodiversity and natural ecosystems in Minsur's areas of influence.
- › Opportunities shall be offered to improve water management, including water efficiency.
- › We shall seek solutions, and develop technologies or practices capable of minimizing the impacts of Minsur's operations on the environment.
- › Likewise, we shall identify actions to prevent, control or correct conditions related to environmental risks and support them diligently.



21. COMPLIANCE WITH LAWS, STANDARDS, AND REGULATIONS

Minsur strictly complies with the laws, regulations, and standards in effect in the countries where it operates. In this sense, the company expects all employees, suppliers, and customers to act in accordance with the law and always do the right thing, even if the rules lack specific guidance.

If the legal regulations establish provisions that are different from those of this Code and Minsur's corporate policies, the strictest rule of conduct shall prevail.

22. CORPORATE COMPLIANCE SYSTEM

Through the Corporate Compliance System (hereinafter, the Compliance System), Minsur promotes its ethical culture, as well as compliance with the company's policies, procedures, and standards. This is done both with our collaborators and with our business partners, as it may be applicable.

This Compliance System was implemented following the provisions of Law 30424, as well as its amending norms and its Regulations, which were approved by Supreme Decree No. 002-2019-JUS. In this sense, the company is committed to:

- ◆ Always act with integrity and transparency, pursuant to the rules, guidelines and principles of good corporate governance; and in accordance with the commitment made by Minsur with its shareholders, partners, customers, suppliers, collaborators and the community.
- ◆ Do not accept or offer any type of bribe or any other type of improper benefit, directly or through third parties, to obtain any undue advantage.
- ◆ Comply with the provisions of the laws applicable to Minsur and/or its shareholders.
- ◆ Comply with the Policies and guidelines established in the Corporate Compliance System.
- ◆ Do not tolerate any acts of public and / or private corruption, influence peddling or any other illegal conduct described in the Peruvian Criminal Code. For more details, review Minsur's Anti-Corruption Policy.
- ◆ Consult the leaders and / or the Legal and Regulatory Compliance Management in charge of the Corporate Compliance System when you are not sure if a conduct is appropriate or not.
- ◆ Report to the Integrity Channel any suspicion of non-compliance or irregular acts carried out by any collaborators or third parties with whom Minsur is related.
- ◆ Support local and international efforts to prevent illegal activities.

23. MONEY LAUNDERING AND FINANCING OF TERRORISM PREVENTION SYSTEM

As part of the Corporate Compliance System, Minsur has a System for the Prevention of Money Laundering and the Financing of Terrorism - MLFTPS whose objectives are:

- ◆ Define and adopt mechanisms and rules of conduct to prevent and control activities related to money laundering and the financing of terrorism.
- ◆ Establish the procedures to record transactions and preserve said information, as well as to report transactions or answer to information requests made by the Financial Intelligence Unit.
- ◆ Continuously and internally disseminate advances made in the fight against money laundering and the financing of terrorism; and incorporate them into Minsur's guidelines and standards.

Minsur also has a Handbook for the Prevention of Money Laundering and the Financing of Terrorism (hereinafter, the Handbook) whose goals are:

- ◆ Serving as a tool for the prevention of money laundering and the financing of terrorism.
- ◆ Instruct all Minsur personnel on how to timely detect unusual or suspicious transactions, potentially related to money laundering and the financing of terrorism. Furthermore, it provides guidelines on how to act in these situations.

Minsur collaborators must act under the following ethical principles and duties regarding the Prevention of Money Laundering and the Financing of Terrorism:

- ◆ **Respect for and compliance with regulations:** Comply with current regulations on the fight against money laundering and the financing of terrorism, as well as this Code of Conduct and the Handbook for the Prevention of Money Laundering and the Financing of Terrorism.
- ◆ **Confidentiality:** Guarantee the strict confidentiality and protection of the Compliance Officer's identity, both with respect to the responsibilities assigned to him by law, as well as in relation to Suspicious Transaction Reports (STRs) that he communicates to the UIF-Peru.
- ◆ **Impartiality:** Objectively and diligently, assess the information you are responsible for to detect any unusual and suspicious transactions and, where appropriate, issue the corresponding reports, evidencing independence and ruling out conflicts of interest with individuals and institutions.
- ◆ **Truthfulness:** Express yourself with the truth and act honestly in the exercise of your activities and fulfillment of your duties, as well as with customers and third parties.

Minsur adopts the measures destined to support its compliance officer and collaborators in general, in the development of activities carried out for the effective compliance of the regulations for the prevention of MLFT.

Under no circumstances will Minsur retaliate against its collaborators, suppliers, customers, counterparts or other members of the Money Laundering and Financing of Terrorism Prevention System due to their compliance with applicable legislation.



- Minsur considers the following as breaches to the Code hereof:
 - ◆ Not signing the sworn statement of receipt and knowledge of the Handbook.
 - ◆ Failure to attend MLFTPS trainings without justification.
 - ◆ Failure to comply with the provisions of the Handbook.
 - ◆ Not reporting any unusual transaction that has been detected.
 - ◆ Others established in Resolution SBS No. 789-2018 that are applicable to Minsur.
- Minsur in accordance with its Internal Labor Regulations and current labor legislation will deal with the aforementioned violations immediately and effectively. Depending on the specific case, these violations will qualify as minor, serious or very serious, and may lead to the application of disciplinary measures, such as: i) verbal warning, ii) written warning, iii) suspension or iv) dismissal.
- For more details on the MLFTPS or the Handbook, or in the event that any unusual transaction is identified, you should contact the Legal and Regulatory Compliance Management through the email fulfillment@mineriabreca.com.
- Minsur condemns all acts of money laundering and terrorism, in all its forms and manifestations, regardless of who commits them, as well as where it occurs and what its purposes are.



24. ETHICAL RELATIONSHIPS WITH CIVIL SERVANTS AND POLITICAL CONTRIBUTIONS

- Public authorities and their respective officials deserve respect in every place where there is also a representative of Minsur. Therefore, the company maintains honest and ethical relationships in interactions with public officials.
 - or entertainment. Finally, Minsur will demand its strategic partners and third parties acting on behalf of the company to maintain this behavior.
- No political party or electoral candidate will be favored. No financial contributions will be made, neither (directly or indirectly) in favor of political parties or political campaigns, nor to specific candidates with donations or other means.
 - Any meeting that Minsur representatives hold with public officials will be held in a transparent manner, complying with record-keeping requirements or similar obligations imposed by the legal framework, as well as the policies and procedures of the Corporate Compliance System.
- Employees - in a personal capacity, in their free time and individually - may participate in political parties of their choice, provided that there is no conflict of interest with Minsur.
 - Minsur employees will never offer, deliver, or promise presents, gifts, benefits, or hospitality to public or private, national, or foreign officials. They will not be able to receive any of these either, since doing so could be perceived as an incentive or commitment. In this sense, it is necessary not to affect the good image and reputation of Minsur.
- Minsur employees will carry out their activities without influencing, conditioning, or interfering with political pluralism of the societies where we operate, managing their relationships with third parties in a transparent manner. Never attempt to put pressure on public or private officials, or business associates, by offering gifts, hospitality,
 - For further details on gifts, gifts, benefits, or hospitality rules, consult the Anti-Corruption Policy and other policies of our Corporate Compliance System.

25. HUMAN RIGHTS AND CONFLICT MINERALS

- Minsur adheres to the United Nations Universal Declaration of Human Rights and respects these rights, wherever we operate.
- Minsur implements a due diligence management system adhering to the "Five-Step Due Diligence Framework" established by the Organization for Economic Cooperation and Development (OECD). The objective is to reduce commercial transactions that, directly or indirectly, finance or benefit armed groups or organizations that contribute to any type of human rights abuse.
- Minsur rejects all forms of torture, cruelty, inhuman treatment and / or forced labor, as well as the indiscriminate use of force and child labor. Likewise, the company repudiates any form of discrimination based on race, religion, skin color, sexual orientation, or otherwise.
- Minsur will constantly identify and assess human rights risks in its supply chain, by designing and implementing a response strategy to the risks detected. Likewise, it will publicly report those policies and due diligence practices in the supply chain.
- It is necessary to recognize those negative impacts on human rights caused by Minsur's activities, either directly or indirectly, as they must be mitigated.

26. OUR CODE IN ACTION

- Although the Corporate Code of Ethics and Conduct contains the main guidelines on how Minsur employees should carry out their activities, it does not explicitly contemplate all critical situations. Therefore, if in the face of any complex circumstance there are doubts about how to act, collaborators should ask themselves:



- If the answer to any of these questions is "No", the collaborator should probably not proceed or decide. If despite this, the employee is still in doubt, he should seek help or consult with the leaders of his area or with the Prevention Officer.

27. HOW TO ASK QUESTIONS OR COMMUNICATE CONCERNS

- ▶ To prevent a concern from becoming a serious problem, it is necessary for the employee to communicate his/her doubts and information to his/her supervisors. Otherwise, the case will not be assessed, and it will not be resolved with appropriate measures.
 - ▶ As recalled, Minsur's Compliance Committee is the council in charge of promoting ethical behavior in Minsur. In the same way, it evaluates and makes decisions regarding breaches to the Code of Ethics and Conduct. Currently, it is comprised by six members:
 - ◆ General Manager
 - ◆ Director of Human Resources
 - ◆ Director of Corporate Affairs
 - ◆ Audit Director
 - ◆ Legal Corporate Manager
 - ◆ Manager of Legal and Regulatory Compliance / Responsible for Prevention
- ◆ Talk to your immediate supervisor or line manager.
 - ◆ Consult with Minsur's Legal and Regulatory Compliance Management.
 - ◆ Consult with a member of the Minsur Compliance Committee.
 - ◆ Report through the Integrity Channel.

28. INTEGRITY CHANNEL

- ▶ As a tool for confidential and private use, this Integrity Channel will receive queries from collaborators anonymously and responsibly, in order to resolve their concerns about actions that they consider unrelated and contrary to the Code of Ethics and Conduct or internal policies and procedures, applying the corresponding disciplinary penalties.
- ▶ Available to all employees, this channel is operated by an independent and specialized company, which will process the information in a reserved manner, and then report to the Minsur Compliance Committee or the Corporate Committee, as appropriate.
- ▶ Definitely, Minsur (and Breca in general in all its business units) positively values the individual commitment of its employees to comply with this obligation. Therefore, there will be no harm or retaliation against those, who report their concerns in good faith. On the contrary, the identity of those who use this Integrity Channel will be safeguarded and protected.

29. ACCESSING THE INTEGRITY CHANNEL

- ▶ To be witnesses and not accomplices: that is the objective of this channel to report irregular or illegal conduct or actions in Minsur. You may access the Channel through:

- 🌐 Website: www.canaldeintegridad.com/Minsur
- ✉ Mailbox: Minsur@canaldeintegridad.com
- ☎ Telephone exchange: 0 800 1 8114 (option 2009)
- 📠 Voicemail or fax: 0 800 1 8114 (option 2)
- 📍 PO box or personal interview: Av. Victor Andres Belaunde 171 – Piso 6, San Isidro, Lima, Peru. Go to the Integrity Channel area – Minsur

GLOSSARY OF TERMS

Shareholders

Holders of one or more shares of Minsur.

Harassment and sexual harassment

Sexual harassment is a form of violence that takes place through any sexual or sexist behavior that is not desired by the person against whom it is directed. This conduct can create an intimidating, hostile, or humiliating environment; or it may affect the activity or employment, teaching, training, or any other work or task, of the victim, although these consequences are not necessarily required.

Strategic ally

External party with whom the organization has or plans to establish some type of commercial relationship. It includes, but is not limited to, customers, consumers, business alliance partners, consortium members, third-party vendors, contractors, consultants, subcontractors, suppliers, vendors, advisors, agents, distributors, representatives, intermediaries, and investors.

Integrity Channel

Tool whose purpose is to address doubts and serious and sensitive concerns of our collaborators in the face of potential irregularities and/or breaches of the Minsur Code of Ethics and Conduct. It uses various mechanisms such as email, website, telephone service, among others, to then process the information and find a satisfactory answer. It is run by an independent professional company specialized in the field.

Intellectual capital

Capacities, attitudes, skills, and knowledge that each management brings to the organization.

Code

This Code of Ethics and Conduct.

Collaborators

All direct collaborators who belong to Minsur, as well as directors, executives, administrators, attorneys-in-fact and, in general, any person who holds a position in the company.

Compliance Committee

Council in charge of promoting ethical behavior in Minsur. It also evaluates and makes decisions regarding breaches of the Code of Ethics and Conduct.

Community

Group or association of people or entities with common interests, properties or objectives. Generally, it refers to the inhabitants or neighbors close to a business operation, or to those who live in its area of influence.

Interest conflict

Situation that arises when a collaborator's personal interest (direct or indirect) influences (or has the capacity to influence) the performance of his/her work obligations. That is why a conflict is generated (or has the potential to occur) between the collaborator's personal interests and Minsur's rights and interests. This results in damages to company's rights and interests, property and/or reputation.

Corruption of civil servants (bribery)

The act of offering, paying, promising to pay or authorizing the payment of money, any object of value or a any type of benefit to a civil servant, or to a political party, or to an electoral candidate in exchange for obtaining or retaining a business or any other undue advantage. It can occur directly or through intermediaries, or it can benefit the servant or a third party. It is a crime.

Private Corruption

Actions of any strategic partner, shareholder, collaborator, or agent of Minsur by which, directly or indirectly, they accept, receive, or request a donation, promise or any improper advantage or benefit, of any nature. It includes the promise, offering, or grant to a company's shareholders, managers, directors, administrators, legal representatives, attorneys, employees, or advisers to obtain any advantage or irregular benefit.

Such benefit may be requested for themselves or for a third party, provided that they perform or omit an act that: (i) allows them to favor another person in the procurement or sell of goods or merchandise, in the contracting of commercial services or in any commercial relations; or (ii) harms Minsur. It is a crime.

Sustainable Development

Development-oriented actions and/or decisions that satisfy present needs without compromising the ability of future generations to satisfy their own.

Diversity

Variety, multiplicity of interaction options. It applies to collaborators, suppliers, or customers, among others

Prevention Officer

He oversees the Corporate Compliance system's design, implementation, and monitors it works properly.

Financing of Terrorism

It is the provision, contribution, or collection of funds, financial or economic resources, financial services or related services to commit terrorist acts. It is classified as an autonomous crime in Legislative Decree No. 25475 and its amendments.

Environmental Management

Set of actions and ideas aimed at respecting and guaranteeing environmental quality, avoiding its degradation.

Social Management

It is the ethical management carried out by Minsur, by aligning its stakeholders' needs to those of Minsur, maximizing the value for both, to achieve sustainable development. Likewise, it is the active and voluntary management of Minsur for the social, economic, and environmental improvement of society in the areas where it operates.

Stakeholders

Set of individuals or organized groups that can affect, be or feel affected by any decision or activity of a company, by direct or indirect impact.

Work hostility

Systematic and recurrent psychological abuse at work in which one person affects another, producing feelings of fear, terror, contempt, or discouragement towards their work. It can occur inside or outside the work environment.

ICMM

The International Council on Mining and Metals (ICMM) is an international organization dedicated to promoting a safe, fair, and sustainable mining and metallurgical industry.

Image

It is the set of strengths and weaknesses that consumers or public opinion attribute to a certain company, brand, product, person, or organization in general. It can be said that it is what the person or entity means to society and how it is perceived.

Confidential information

Any information, which access, disclosure and dissemination is restricted. Thus it is only accessible to those explicitly authorized persons.

Inside information

One to which only certain people have direct access due to their position, profession, or trade.

Money laundering

It is a crime defined in Legislative Decree No. 1106, as the process of disguising or concealing the illegal origin of money, goods, effects or profits that come from other crimes (corruption, drug trafficking, tax evasion, etc.). It usually occurs after the completion of several financial and banking transaction, by one or more natural or legal persons. In other laws, this crime is called "money laundering", "money or asset whitening", "legitimation of capitals", "legitimation of illicit profits", among others.

Standard for prevention of PMLFT

Standard for the Prevention of Money Laundering and the Financing of terrorism, of general application to subjects obliged to report under the supervision of the FIU-Peru, approved by Resolution SBS No. 789-2018.

Compliance Officer

He oversees the MLFTPS design, implementation, and monitors it works properly. It is the communication link between Minsur and the Financial Intelligence Unit - Peru.

Cultural plurality

It is the existence of different cultures within a business environment, a product of the different characteristics of our operations, as well as the territorial location of Minsur and its Operation Units.

Intellectual Property

Set of rights that correspond to the authors and other owners of an idea, a document, or a creation of the human intellect.

Presents, gifts and hospitality

They are customary courtesies or invitations designed to cultivate business relationships, the practice of which is accepted as part of the culture of society.

Reputación

It is the general opinion held about a person, a company, or a conglomerate. For Minsur and Breca, it is a valuable intangible asset achieved by following the values and conduct of its founders.



Corporate Compliance System

An organized system of standards, mechanisms and procedures (contained in codes, policies, among others) for prevention, surveillance and control, implemented by Minsur in order to reasonably mitigate the risks of committing crimes referred to in Law No. 30424, its amending regulations and its Regulations, approved by Supreme Decree No. 002-2019-JUS.

Bribery

Offer, promise, delivery, acceptance, or request of an undue advantage of any value (either financial or non-financial), directly or indirectly, and regardless of its location. It occurs in violation of the applicable law, as an incentive or reward for a person to act (or stop acting) in accordance with the performance of their obligations.

Partner

Person or institution formally committed to Minsur or Breca to promote or develop a common business purpose.

MLFTPS

It is the System for the Prevention of Money Laundering and Financing of Terrorism that Minsur has implemented, in order to put into practice all the internal controls and tools that promote proper compliance with the standards for the prevention of such crimes.

Obligated subjects

Natural or legal person that is dedicated to any of the activities indicated in article 2 of SBS Resolution No. 789-2018.

Influence peddling

Crime that is configured when a person - using or having real or simulated influences - receives, gives or promises for him/herself or for a third party, a gift or promise or any other advantage or benefit in order to intercede before an official or public servant who must know, is knowing or has known a judicial or administrative case.

UIF Peru

Financial Intelligence Unit of Peru, Deputy Superintendent of the Superintendency of Banking, Insurance and Private Pension Fund Administrators, created by Law 27693.





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