

> **CODE OF ETHICS AND CONDUCT
FOR MINSUR S.A.'S SUPPLIERS
AND CONTRACTORS**



MINSUR

World-class
Peruvian mining



CODE OF ETHICS AND CONDUCT FOR MINSUR S.A.'S SUPPLIERS AND CONTRACTORS

My behavior and my integrity
are key for our success

> CODE OF ETHICS AND CONDUCT FOR MINSUR S.A.'S SUPPLIERS AND CONTRACTORS

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Dear suppliers and contractors:

Sustainability is the cornerstone of Minsur's 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 other words, we cannot be a responsible company if we fail to ensure sustainability across our entire value chain.

In this regard, you are key to the correct progress and growth of our projects and operations, as well as to the sustainability approach guiding our actions as a company and as an agent of development in our society. To fulfill these objectives, it is essential that we maintain ethical relationships of cooperation and respect with our suppliers and contractors.

For that reason, we have prepared this Code, which enables us to share our philosophy, values and corporate practices of ethics and sustainability with suppliers, contractors, external advisors and business partners, regardless of their specific field or business location.

For all the above, considering the international standards we have adopted as a member of the ICMM, which shall be met across our entire supply chain, we call upon our suppliers, contractors, external advisors and business partners to permanently comply with the provisions of the Code hereof, within the framework of their business relationship with Minsur.



Juan Luis Kruger Sayán
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



These values are reflected in our business culture, which translates into the policies that guide our actions: The Corporate Sustainability Policy, the Corporate Compliance Policy, the Corporate Human Rights Policy and the Code of Ethics and Conduct, the Occupational Health and Safety policy, Anticorruption and antibribery policy, Anti-money laundering policy, Policy for the prevention of sexual harassment at the workplace, among others.

4. Our Code of Ethics and Conduct for Suppliers

This Code develops Minsur's mission and values and serves as a guide for our company's suppliers and contractors, and for those who are part or act on behalf of them in a global, complex and changing environment. Cooperation based on ethics and respect among our stakeholders and Minsur's social environment is essential to fulfill the company's objectives.

This Code applies to all stakeholders, contractors, external advisors and consultants, business partners, customers, including any third-parties -duly authorized- who act on behalf of Minsur (hereinafter, "suppliers"), who have a business relationship with Minsur due to the procurement of goods, services and/or business cooperation agreements, regardless of the type of service and/or goods procured, their geographic location or their field.

5. Our relationship with suppliers

Minsur works on strengthening and maintaining ethical cooperation relationships with its suppliers. Thus, we abide by transparent, technical, clear and accurate criteria for selecting suppliers, and by professional and ethical standards that aim at satisfying Minsur's needs with goods and services of the required quality to fulfill our objectives.

All suppliers may participate in different selection processes under the same conditions and opportunities. Both their merits and qualifications shall be important when assessing their proposals. This process is conducted without bias or discrimination based on race, religion, nationality, skin color, gender, sexual orientation, identity, age or disability, or otherwise.

Our suppliers are significant stakeholders and



thus they deserve to be treated with dignity. We fully fulfill our promises, commitments, agreements, and contracts. Likewise, we expect to receive the same treatment, in a way that is consistent with our values and business philosophy.

At Minsur, we value excellence, ethics as well as high social and environmental standards. Based on these, we create relationships of trust and transparency when dealing with communities, and we expect our suppliers to adhere to them. Thus, we seek to consolidate a comprehensive vision of sustainability in all our practices.

6. Selection and procurement

Supplier selection and procurement is carried out under the following criteria:

- **Open access to participation in the market of goods and services:**

It allows improving Minsur's efficiency and profitability, under the principles of respect, transparency, loyalty and good faith.

- **Legality of goods and services:**

We will only enter into agreements with legally incorporated suppliers, who comply with their social purpose, regulations and other legal procedures and, at the same time, promote and verify that their suppliers, subcontractors and other business partners also comply with them.

- **Compliance with procedures:**

To select our suppliers, we have established several internal procedures and standardized forms, which provide us information on suppliers and the products or services they offer in the market.

- **Promotion of local development:**

Minsur is committed to the promotion of procurement in places and areas of influence, where our Mining Units operate, under equal conditions, without bias or discrimination based on race, religion, nationality, skin color, gender, sexual orientation, identity, age, disability, or otherwise.

Minsur shall make this Code available to suppliers, together with all the policies, procedures and other documents, as applicable pursuant to the business relationships derived from the procurement of goods and services.

7. Procurement of suppliers and their relationship with Minsur's employees

- It is critical to maintain independence between suppliers and Minsur's employees. For that reason, any commercial relationship or procurement of services between a supplier and any of Minsur's employees, or any of his/her relatives up to the fourth degree of consanguinity and second degree of affinity, shall be informed immediately to Minsur's user department, logistics department and/or compliance department in writing, pursuant to the provisions of the conflict-of-interest policy.
- If there is a conflict of interest, and it has not been reported in writing, it will be considered that such conflict of interest has been concealed, and thus Minsur shall be entitled to terminate the contract with the supplier.
- Minsur's suppliers shall not purchase any goods or services from Minsur's employees or their relatives. For instance, renting vehicles or machinery from any of Minsur's collaborators, or hiring any of Minsur's employees or any of their relatives as a consultant or to provide training services.
- The supplier shall report any potential, real or apparent conflict of interest in situations in which its subcontractors hire goods and/or services from any of Minsur's collaborators or their relatives, so that Minsur analyses and evaluates the situation.

8. RESPONSIBILITY OF OUR SUPPLIERS

8.1. Diversity, equal opportunities and respect

- Respecting and promoting Human Rights internally, and in relationship with their environment and other stakeholders.
- Offering an environment of cultural plurality and diversity allowing their employees to develop with equal opportunities, respect, dignity, justice and kindness.
- Promoting respect among work colleagues and job applicants, without discrimination on the basis of race, skin color, gender, place of origin, language, religion, sexual orientation, disabilities, political preferences, or otherwise.
- Promoting an environment of respect, openly and categorically rejecting any acts of sexual harassment, as well as any acts of hostility in the workplace.
- Promoting a work environment where employees' human rights are respected, both individually and through trade unions. This means that labor laws and regulations are complied with, and the different opinions of employees are respected.
- Respecting their workplace and employees, ensuring that Minsur's reputation and good image are upheld.



- Promoting a fair work environment, without favoritism. If there is a possibility to hire a relative of any employee of Minsur, it shall be priorly reported to Minsur's responsible department to prevent any potential conflicts of interest.

8.2. Labor rights and freedom of association

- Respecting, complying with and applying labor laws applicable to their employees. Thus, enforcing laws and applicable regulations concerning work schedule and working hours, wages, freedom of association and collective bargaining, among others. Furthermore, suppliers and their sub-contractors shall in no case hire or allow -directly or indirectly- any form of child, forced, or compulsory labor. In the case of adolescent labor, suppliers shall ensure compliance with current domestic laws and international treaties to which Peru is signatory.
- Minsur expects that all its suppliers commit and ensure a workforce free of harassment and discrimination. Thus, in no case suppliers and their subcontractors shall discriminate their collaborators on the basis of ethnicity, nationality, social background, gender and gender identity, sexual orientation, disabilities, religion, political affiliation or union membership.
- Suppliers and their subcontractors shall respect local communities at all times. Minsur requires its suppliers to be aware when interacting with local communities, including indigenous peoples and vulnerable populations, ensuring their rights and acting respectfully and fairly towards them.

8.3. Safe and healthy environment

- Safety is one of the main values for Minsur. People's life and integrity is of the utmost importance. Thus, we promote a culture of safety based on prevention. This applies to our collaborators and to suppliers who carry out activities in our corporate offices and/or mining units. If a task or a workspace is not safe, activities must stop.
- Suppliers and their subcontractors shall ensure and promote a safe and healthy work approach for all their collaborators. Pursuant to the law, they must get life insurance, as well as Complementary Risk Work Insurance (SCTR) considering each employee's type of work. Furthermore, they must keep both policies into force while providing services to Minsur. Likewise, they must maintain appropriate controls, work procedures and safety equipment, according to the types of risks that correspond to their activities and pursuant to relevant laws.
- Suppliers and their subcontractors conducting their duties in Minsur's facilities shall ensure that their work environment meet safety and health conditions according to Minsur's Occupational Health and Safety policies and procedures and applicable laws.

- Suppliers and subcontractors must immediately report any risks or incidents they identify at Minsur's facilities, in order to make timely and necessary decisions.
- The use, possession or sale of illegal drugs or alcohol shall not be allowed under any circumstances. Therefore, consumption of alcohol or of any illegal drugs is forbidden in the company's facilities or in the vicinity of Minsur's units. Likewise, it is forbidden to enter such spaces under the direct or indirect influence of these substances. In the event that any collaborator of the supplier or its subcontractors is consuming any medication that could impair their normal capacity and performance, or cause drowsiness, they must inform the medical department or the contract manager in writing, or by any accreditable means, so that the necessary measures are taken.
- Visitors shall be required to take the indicated health and safety measures, which shall be monitored in the company's premises.
- Practice of Minsur's standards shall be promoted by sharing them with suppliers and customers.

8.4. Transparency and integrity in our actions

- Minsur undertakes to require third parties (partners, strategic partners, agents, suppliers, etc.), who represent the company in the public and private scope, to understand and meet the company's ethical guidelines and internal policies that are related and/or mentioned in the Code hereof.
 - Under no circumstances shall Minsur's assets and other goods be used for illegal, harmful or offensive purposes towards Minsur or third parties.
- For no reason shall take advantage of the opportunities for personal enrichment that occur both in the exercise of the functions as in the use of resources of Minsur.
 - Minsur's suppliers and collaborators shall not give, offer or accept any gifts, benefits or hospitality within the framework of the execution and/or implementation of the services hired by Minsur. For further details, check out our Anti-Corruption and Anti-Bribery Policy.



8.5. Protection of confidential information and intellectual property

- All suppliers declare that they are aware that information provided by Minsur is confidential and privileged and thus it shall not be used without the prior explicit consent of Minsur. Any information received by the suppliers or generated because of the contract relationship they have with Minsur shall be deemed as confidential, unless Minsur states it is public.
- It is Minsur's priority to protect the personal and confidential information of its employees, suppliers, customers and third parties. Likewise, it is the duty of suppliers to protect Minsur's personal data, as well as confidential and classified information, which they have access to. Even if the business relationship has ended, such information shall be handled pursuant to applicable laws, corporate professional responsibility and confidentiality agreements they have entered into.
- Inside information shall not be used without Minsur's prior authorization, for purposes other than those corresponding to the contract relationship between Minsur and its suppliers within the framework of their business relationship. Under no circumstances such information shall be used for their 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.

- Suppliers shall not use Minsur's logo or any corporate identity items, except with Minsur's explicit authorization.
- All documents produced, originated, provided, and obtained during our business relationship, 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.

8.6. Integrity in the market

- We reject any acts that prevent free competition in the markets in which we participate. Minsur is committed to active and honest competition, under market ethical principles and legal standards, and it is a constant requirement for our suppliers in all their practices.
- Under no circumstances suppliers will represent or become Minsur's spokespersons before the press and/or the media, including social networks. The link with the media shall only be established through official spokespersons designated by Minsur.
- Likewise, no supplier may claim to represent Minsur or assume commitments to third parties without Minsur's explicit written authorization.

8.7. Good relationships and investment in our communities intellectual property

- Minsur recognizes that mining is a socioeconomic activity that is closely related to social and environmental aspects, in the areas where it is developed. For this reason, it is our interest that our suppliers have a good relationship with the communities and/or populations where Minsur operates.
- Minsur has a Social Management Protocol for Contractors, which shall be reviewed and complied with by suppliers who -due to their contract relationship with Minsur- have a direct or indirect relationship with the communities or populations in the areas of influence where we operate. Such protocol addresses Minsur's prioritized issues, such as community relations, local employment and procurement and human rights, among others.
- Minsur complies with the laws and provisions related to relevant social aspects. In this sense, it disseminates the contents and objectives of our Social Management Policy with our suppliers, in order to promote responsible engagement and attitude.
- Suppliers shall take into account our stakeholders' points of view and expectations during the decision-making process, according to the provisions of the relevant contract.
- Ethnic, religious and cultural diversity shall be respected by Minsur and its suppliers, as are the customs, traditions, principles and values of the communities and populations with which they interact.

- Suppliers operating in the areas where Minsur has direct or indirect influence undertake to contribute to the sustainable development of the communities and populations of such areas, acting in a transparent and socially responsible manner, as it may correspond according to the nature of the contract they have with Minsur.

8.8. Native peoples and indigenous populations

Minsur undertakes to respect the customs and traditions of native peoples and indigenous populations, and it values their members and representatives. Therefore, it extends to its suppliers its corporate policies on sustainability, human rights and native peoples and indigenous populations, which shall promote the following practices:

- The respect to the customs and traditions of native peoples and indigenous populations.
- Appreciation of the special connection indigenous peoples and local communities have with the land and water. Thus, the company will seek mutually beneficial agreements with the communities, as it recognizes them as part of the development and implementation of mining operations.
- In relation to operations or major new capital projects located on lands traditionally owned or occupied by indigenous and native peoples, Minsur shall abide by its corporate policy on indigenous and native peoples, which is aligned with the ICMM position statement. Furthermore, it shall complete the host government's regulatory processes and comply with applicable laws.

8.9. Environmental protection

- Minsur is committed to the development of environmentally sustainable activities, complying with the laws and regulations applicable to our operations, and requires the same commitment from its suppliers, who shall conduct their activities responsibly, protecting and respecting the environment and managing risks, mitigating and repairing them as it may correspond.
- Minsur expects its suppliers establish and maintain processes and procedures to mitigate risks and minimize environmental impacts, developing practices that continuously improve their performance in this aspect.
- Minsur encourages its suppliers to monitor and document power consumption and all relevant aspects related to their carbon footprint measurement. Moreover, we invite them to collaborate in the reduction of greenhouse gas emissions.
- Our suppliers, being aware that water is a scarce resource we must protect, fully adhere to our Policy of Excellence in Water Management.

8.10. Compliance with the laws, standards and regulations

- Minsur requires all its suppliers to strictly comply with the laws, regulations and relevant standards, as applicable according to their sector, and the type or modality of goods and/or services they provide. Furthermore, it trusts in its suppliers' good faith and their relevant judgement whenever rules lack specific guidelines.

- If the laws establish provisions that are different from those included in the Code of Ethics and Conduct for Minsur's suppliers, the strictest rule shall prevail.



8.11. 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 referred to in the Code hereof. These provisions apply to our suppliers, as well as to their collaborators and subcontractors, as it may be applicable.

According to the Compliance System, implemented pursuant to the Law 30424, as well as its amending and/or complementary rules, suppliers are committed to:

- Always act with integrity and transparency, pursuant to the rules, guidelines and principles of good corporate governance.
- Not to accept or offer any type of bribe or any other type of improper benefit, directly or through third parties.
- Comply with the provisions of applicable laws.
- Comply with the policies and guidelines established in the Corporate Compliance System.
- Report to the Integrity Channel any suspicion of non-compliance or irregular acts carried out by Minsur's collaborators or third parties with whom Minsur is related.
- Support local and international efforts to prevent illegal activities.

- In Minsur, we do not accept gifts, presents, benefits or special hospitalities from our suppliers to our collaborators, and the other way around, since it may be perceived as an incentive or commitment. It is required to prevent any conflicts of interest that may affect Minsur's reputation and good image, and that of its suppliers.
- In conclusion, under no circumstances will Minsur tolerate that its suppliers commit acts of public or private corruption, influence peddling or any other illegal conduct described in the Peruvian Criminal Code.

8.12. Money laundering and financing of terrorism prevention system

- According to the Money laundering and financing of terrorism prevention system (MLFTPS), Minsur has a Compliance Officer responsible for implementing it, executing it and carrying out continuous monitoring. Likewise, there is a Handbook for the Prevention of Money Laundering and the Financing of Terrorism, which sets forth the provisions, responsibilities, and shall be made available to the suppliers, to be appropriately applied, as it may correspond.
- Minsur expects that its suppliers contribute to the prevention of money laundering and the financing of terrorism, adhere or share the same prevention standards and abide by the following principles and ethical duties:

» **Respect and compliance with the regulations.**

Comply with current anti-money laundering and financing of terrorism regulations, as well as with this Code of Ethics and Conduct for suppliers and the Handbook for the Prevention of Money Laundering and the Financing of Terrorism.

» **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.

- In no case shall Minsur retaliate against its suppliers or counterparties or any other participants in the MLFTPS for having complied with relevant laws.
- The actions described below shall be deemed as violations to the Code hereof:
 - » (i) Not signing the affidavit of receipt and knowledge of the Handbook.
 - » (ii) Failure to comply with the provisions of this Code.
 - » (iii) Not signing the suppliers' statements of compliance.

Abovementioned violations shall be addressed immediately and effectively by Minsur, which may result in the temporary or definitive suspension of the business relationship it has with the infringing supplier.

Minsur condemns all acts of money laundering and terrorism in all its forms, regardless of who commits them, where, and what are their purposes.



8.13. Ethical relationships with public officials and political contributions

- Public authorities and their respective officials deserve respect in every place where Minsur's suppliers are or act on behalf of the company. Therefore, Minsur and its suppliers shall maintain honest and ethical relationships in interactions with public officials.

- Suppliers shall perform the activities and services hired by Minsur without influencing, conditioning or interfering in the political pluralism of societies where we operate, managing their relationships with third parties in a transparent way. They shall never attempt to put pressure on public or private officials, or business associates, by offering gifts, hospitality, or entertainment.
- Any meeting that advisors, consultants or third parties hold with public officials on behalf of Minsur shall 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 Minsur's Corporate Compliance System, especially the Policy and Procedure for Interaction with Public Officials.
- Minsur suppliers shall never offer, deliver or promise presents, gifts, benefits, or hospitality to public or private, national, or foreign officials, as Minsur's suppliers. 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 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.
- It is necessary to recognize those negative impacts -both real and potential- on human rights caused by Minsur's activities, either directly or indirectly, as they must be mitigated and repaired whenever it may correspond.
- 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 will constantly identify and assess human rights risks in its supply chain, by designing and implementing a strategy to respond to detected risks. Likewise, it will publicly report those policies and due diligence practices in the supply chain.

8.14. Human Rights and Conflict Minerals

- Minsur adheres to the United Nations Universal Declaration of Human Rights and respects these rights, wherever we operate and with those we establish relationships.
- Suppliers shall respect human rights of their collaborators and third parties they interact with, treating them with dignity, respect and justice.

9. Conflict of interest

- A conflict of interest exists when the personal interest (direct or indirect) of a specific supplier influences -or has the capacity to influence- the performance of its contract obligations. For that reason, a conflict arises (or potentially arises) between the supplier's personal interests and Minsur's rights and interests. This, results in damages to the company's rights and interests, property and/or reputation. A supplier with a conflict of interest shall make sure that it is reported to Minsur before entering into any business relationship.

- The cases below -among others- are examples of direct or indirect conflicts of interest:
 - » Economic participation of Minsur's employees or their spouses, permanent partners or any relative up to the fourth degree of consanguinity and second of affinity, in a company that supplies goods and services to Minsur, when such employees are responsible for the business relationship.
 - » Granting or receiving loans from employees responsible for the business relationships.
 - » Having relationships with an employee that prevent ensuring objectivity in the business relationship.
 - » Offering exclusive or preferential discounts to the company's employees in their personal businesses, except when the company has authorized purchase plans.



10. Integrity channel

Minsur encourages suppliers to communicate their concerns in relation to unethical situations and/or suspicions of bad practices, as soon as possible through our Integrity Channel.

The Integrity Channel is a tool for confidential and private use, that will receive queries and/or complaints from our suppliers anonymously and responsibly, in order to resolve their concerns about actions that they consider unrelated and contrary to the Code of Ethics and Conduct for suppliers.

Communications carried out through the Integrity Channel shall always respond to truthfulness and proportionality criteria. These shall not be used for purposes other than the compliance with this Code of Ethics and the laws into force.

Minsur will not adopt any form of direct or indirect retaliation against those professionals or suppliers who report -through our Integrity Channel- any behavior that shall be reported pursuant to the Code of Ethics hereof, unless it is proved that they acted in bad faith.

The rights to privacy, defense and the presumption of innocence of those who are being investigated shall be ensured in all investigations.

In the event that a supplier needs to file a complaint regarding any acts against the provisions set forth in this Code, it may use the following means:

- Website:
www.canaldeintegridad.com/Minsur
- Mailbox:
Minsur@canaldeintegridad.com
- Call center:
0 800 1 8114 (opción 2009).

- Voicemail or fax:
0 800 1 8114 (opción 2).
- Address or personal interview:
[Av. Victor Andres Belaunde 171, Floor 6. San Isidro, Lima, Peru, with reference to: Integrity Channel – Minsur.](#)

11. Implementation and Monitoring

- Suppliers and subcontractors shall comply with the provisions of the Code hereof, and thus they have established a process to confirm and verify compliance. Minsur reserves the right to request information and data.
- Based on the OECD Due Diligence Framework, Minsur may audit the supplier's business, operations and facilities.
- In the event that Minsur finds out that a supplier does not comply with this Code, it will start a dialogue with that supplier to promote and support enhancements. Suppliers shall communicate these critical principles and requirements to their own suppliers and subcontractors and encourage them to meet these standards.
- This Code of Ethics and Conduct for Suppliers establishes general guidelines in relation to the corporate ethical culture that Minsur maintains and promotes within the business relationship it has with suppliers and business partners. Nevertheless, Minsur has specific policies and standards that shall also be reviewed and applied by suppliers, as it may correspond. You may find such documents in our website:

<https://www.minsur.com/quienes-somos/politicas-empresariales/>.

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 physical or psychological behavior of a sexual or sexist connotation 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 suppliers, customers or any stakeholders related to Minsur, 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, assess it, investigate and find a solution. 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 employees, 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.

Conflict of interest

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

Contractor

Natural or legal person who has a civil relationship with Minsur, because it was hired to execute works, constructions and/or projects in general. Contractors may perform their duties at Minsur's facilities and mining units, as it may correspond.

Corruption of public official (bribery)

The act of offering, paying, promising to pay or authorizing the payment of money, any object of value or any type of benefit to a public official, 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 official 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, advantage or any improper benefit, of any nature. It includes the promise, offering, or grant of any advantage or irregular benefit to a company's shareholders, managers, directors, administrators, legal representatives, attorneys, employees, or advisers.

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

The person in charge of designing and implementing the Corporate Compliance system, and who 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 company, 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 one, 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.

Asset 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 MLFT

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

Compliance Officer

He is in charge of designing and implementing the MLFTPS, and monitoring 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.

Anti-corruption and Anti-bribery policy

This policy sets forth the commitments and general guidelines for the prevention of bribery as well as public or private corruption, as provide by the laws into force in the countries where we operate, and pursuant to the best international anti-corruption practices.

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.

Supplier(s)

A supplier is any natural or legal person who develops a business activity and provides goods and services to Minsur, so that it can use them to carry out its economic activity. The most common types of suppliers are: suppliers of goods, suppliers of resources or suppliers of services.

The term "supplier" or "suppliers" also includes sub-contractors who provide any type of services to the supplier within Minsur's units, who shall also comply with this Code of Ethics and Conduct for Suppliers.

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. However, these practices are not accepted by Minsur.

Reputation

It is the general opinion or perception 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-IUS.

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.

FIU Peru

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

Fourth degree of consanguinity

The following table states the degrees of kinship, both directly or collaterally, such as consanguinity and affinity.

Degrees	Collaborator / spouse			
	Parents	Parents-in-law	Children	Children-in-law
1	Parents	Parents-in-law	Children	Children-in-law
2	Grandparents	Siblings	Siblings-in-law	Grand children
3	Great grandparents	Uncles and aunts	Nieces and nephews	Great grandchildren
4	Cousins	-	-	-

ADHERENCE TO THE CODE OF ETHICS AND CONDUCT FOR SUPPLIERS

I hereby declare that I have read the Code of Ethics and Conduct for Minsur's suppliers, and thus:

- I understand all the terms and the standards of Conduct that govern your organization.
- I undertake to respect, comply with and enforce the provisions of the Code of Conduct for Minsur's suppliers so that my employees and subcontractors also comply with it, in all that applies to me.
- I agree that non-compliance with this Code, by the company I represent or any of its employees, represents a serious breach that may result in the immediate termination of our business relationship with Minsur and related companies, as it may correspond.

Name and last name of the declarant:	
Corporate name / name of the supplier he/she represents:	
Position:	
Date:	
Signature of the supplier's legal representative:	

AFFIDAVIT OF CONFLICT OF INTEREST

The purpose of completing this statement is reporting to Minsur the possible conflict of interests (potential or real) that may arise in the supply of goods and provision of services by our suppliers.

This is a sworn statement that applies to all our suppliers. It shall be completed by the legal representative with valid powers of attorney.

It shall be answered completely and truthfully. The information provided in this document shall not be subject to any penalties. However, the omission or inaccuracy of stated information constitutes a breach of Minsur's Code of Ethics and Conduct for suppliers.

This form shall be completed by the supplier's legal representative and delivered to the logistics representative and/or the user department.

1. Complete the general data below:

Supplier's corporate name:	
Taxpayer Identification number	
Legal representative's name and last name:	
Legal representative's position:	

2. Do you have any relatives working for Minsur?

Parents	Yes ()	No ()
Children	Yes ()	No ()
Siblings	Yes ()	No ()
Spouse	Yes ()	No ()
Living partner	Yes ()	No ()
Others		

Name:	
Degree of kinship:	
Department:	
Position:	

3. Do you have any relatives, who individually or through a legal person supply goods and/or services to Minsur?

Parents	Yes ()	No ()
Children	Yes ()	No ()
Siblings	Yes ()	No ()
Spouse	Yes ()	No ()
Living partner	Yes ()	No ()
Others		

Name:	
Address:	
Corporate name / Taxpayer ID	

4. Do you have any relatives, who individually or through a legal person supply goods and/or services to the government (public agencies, local community authorities, among others)?

Parents	Yes ()	No ()
Children	Yes ()	No ()
Siblings	Yes ()	No ()
Spouse	Yes ()	No ()
Living partner	Yes ()	No ()
Others		

Name:	
Address:	
Corporate name / Taxpayer ID	

5. Does the supplier have related companies currently providing services to Minsur?

Yes ()	No ()
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Corporate Name / Taxpayer ID:	
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6. Are you a consultant, director, executive or employee of another supplier of Minsur?

Yes ()	No ()
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Name:	
Address:	
Corporate name / Taxpayer ID	

7. Do you have an economic interest in any of Minsur's employees?

Yes () No ()

Name:	
Address:	
Corporate name / Taxpayer ID	

8. In the last 12 months, have you or any other employee with decision-making powers, or posted in our facilities or mining units, or working as an advisor responsible for the Minsur's account in your company, worked in a government agency as a Politically Exposed Person (PEP)?

Yes () No ()

Name and last names:	
Position:	

9. Have any of your company's associates, directors, legal representatives worked in a government agency as a Politically Exposed Person (PEP)?

Yes () No ()

Name and last names:	
Position:	

10. Do you, supplier's legal representative, have any relatives working for other Minsur's suppliers or customers?

Yes () No ()

Name and last names:	
Position:	

I wish to report the following conflicts of interest (real or potential) that were not indicated above:

1.	
2.	
3.	

I hereby declare that the information provided in this Affidavit is truthful, correct and complete. I undertake to update the information provided, in the event of any change. For that purpose, I will contact the user department of the good/service hired and/or will send an e-mail to cumplimiento@minerabreca.com

Declarant's name and last name:	
Position:	
Department:	
Date:	
Signature:	

