

Corporate fiscal policy

MINSUR S.A. is a Peruvian mining company whose purpose is to improve lives by transforming minerals into well-being. With operations in Peru and Brazil, it carries out exploration, mining, beneficiation, and commercialization activities for tin, copper, gold, and other minerals. Our management is based on the principles of transparency, good judgment, and free competition. Similarly, we strive to implement the best fiscal practices in alignment with the recommendations of the Organization for Economic Cooperation and Development (OECD) in a manner and spirit consistent with the regulations applicable in our host countries.

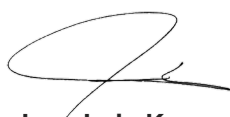
We are governed by the following principles:

- The company's fiscal decisions are linked to the payment of taxes in all those jurisdictions where we perform an economic activity. We do not transfer the created value to tax havens to reduce transparency or avoid paying taxes.
- We use structures with sufficient economic substance and engage in honest business practices.
- We make reasonable interpretations of tax regulations and double taxation avoidance agreements.
- We establish a transfer price policy for our operations between related parties, which is based on the arm's length principle.
- We actively work to adapt to the globalized environment, to face the challenges posed by the digital economy, including fiscal matters.
- We promote a reciprocally cooperative relationship with the appropriate tax authorities, based on the principles of transparency, mutual trust, good faith, and loyalty between the parties.
- We provide the information required by the tax authorities in a timely manner. If we note any breach of tax regulations, we take corrective actions and apply sanctions in accordance with our Code of Ethics and Conduct.
- We pay taxes pursuant to the tax regulations of the countries where Minsur and its subsidiaries have operations. This is an important part of our contribution to development.
- We promote a transparent, clear, and responsible communication of our main fiscal magnitudes by reporting to our stakeholders the relevant tax payment information.

The aforementioned principles govern the company's tax matters. They are applied by the Finance Department, which has established the necessary training programs and control mechanisms, as well as the internal rules that will be supervised by the Audit Department.

This policy applies to Minsur and its subsidiaries, and in the development of new business, mergers and acquisitions. We also promote adoption of our principles among our key business partners, suppliers, service providers, and contractors.

This policy will be reviewed and updated every three (3) years or before, if necessary.



Juan Luis Kruger Sayán
Chief Executive Officer

Lima, September 18, 2024