

Corporate Anti-corruption and Anti-bribery Policy

This Corporate Anti- Corruption and Anti-Bribery Policy sets forth the commitments and guidelines necessary to prevent bribery and public or private corruption, pursuant to the laws into force in the countries we do business and considering the best international anti-corruption practices.

The Policy hereof is part of our Corporate Compliance System and it contains a statement of zero tolerance in the fight against illegal activities and/or acts that are contrary to our corporate values, as established in our Code of Ethics and Conduct for employees and in our Code of Ethics and Conduct for suppliers and contractors; and, it applies to all the employees of our company, its subsidiaries, business units and projects, as well as to our strategic partners (contractors, suppliers and customers), as applicable.

Based on this policy, we:

1. Practice and promote a culture of ethics and corporate compliance at all times, seeking to prevent and detect any type of bribery and corruption. Our culture is promoted by our Board of Directors, General Management, Compliance Officer and the leaders of our organization.
2. Promote compliance with this Policy among all our employees, so that it becomes a pillar when making decisions that concern them, as well as compliance with other specific anti-corruption and anti-bribery policies and procedures, in order to prevent their actions from being -or being perceived as- illegal, inappropriate or linked to the commission of crimes.
3. Prohibit offering, promising, directly or indirectly paying, as well as making any insinuations, hospitality or gift to public officials and/or any third parties, in order to obtain undue economic gains or other advantages in return, for him/herself or any third parties. In addition, we do not make political contributions or facilitation payments.
4. Make our Integrity Channel available to employees and strategic partners, so that they may report, anonymously and confidentially, any violation of our corporate policies, internal procedures, or any of our Corporate Compliance System's provisions. In addition to this, we ensure impartial investigations, as well as protection from retaliation.
5. Assess our employees and strategic partners before and after the beginning of our business relationship in accordance with our due diligence procedures, and we reserve the right to apply the corresponding penalties and/or corrective measures, in case any bribery or corruption act is identified.
6. Disseminate this policy and train our employees, so that they fully comply with it and all the policies that make up our Corporate Compliance System, in line with domestic laws and international standards.

Minsur values the commitment of all our employees and strategic partners to complying with this Policy, acting with transparency and integrity when carrying out activities concerning our company.

Lima, September 2022



Juan Luis Kruger
General Manager