This Corporate Compliance Policy sets forth the commitments and guidelines necessary for the good governance of our Corporate Compliance System in all our operations and commercial activities.

The Policy hereof is part of our Corporate Compliance System and it applies to all the employees of our company, its subsidiaries, its mining 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 compliance at all times. By doing this, we contribute to society, sustainability and the good reputation of our company. Our culture is promoted by our Board of Directors, General Management, Compliance Officer and the leaders of our organization.
- 2. Abide by the law in the jurisdictions where we operate, and we comply with legal regulations governing our activities, and fulfill our agreements, as well as the guidelines and commitments established in our Code of Ethics and Conduct and other internal policies.
- 3. Have a Corporate Compliance System that allows us to identify, assess, act promptly and prevent any potential breaches of the law or our internal policies. Thus, we have implemented different tools, processes and training to guide our employees when performing their duties, and to contribute to the development of a culture of integrity within our organization.
- 4. Manage the concerns reported through our Integrity channel, in order to promptly correct any breaches of our Corporate Compliance System's provisions. Likewise, we have a Compliance and Human Rights Committee, responsible for ensuring that our system works properly and effectively.
- 5. Assess and punish, as it may correspond, any acts performed or attempted by our employees or strategic partners, contrary to our Corporate Compliance System and applicable regulations. Such actions shall be deemed as serious misconduct and will result in the corresponding disciplinary actions to our employees and corrective actions to our strategic partners. If the breach involves an illegal act, it will be reported to the competent authorities.
- 6. Ensure continuous improvement of our Corporate Compliance System, through internal and external monitoring mechanisms and/or feedback on its management.

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

Lima, September 2022

Juan Luis Kruger General Manager

