

Responsible Mineral Supply Chain Policy

The policy herein establishes the commitments and general guidelines of Minsur, its subsidiaries, and related companies to ensure proper due diligence systems that promote respect for human rights and guarantee the responsible supply of minerals. The following guidelines apply to the production, transportation, and commercialization of tin, tantalum, gold, and copper, as well as any secondary material or by-product destined to obtain these minerals that may come from conflict or high-risk areas (CAHRAs).

These guidelines are consistent with our internal policies, such as our Code of Ethics and Conduct for Suppliers, Human Rights Policy, Anti-corruption Policy, and the Policy for the Prevention of Money Laundering and Financing of Terrorism; as well as with international standards on these matters, including the "Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-affected and High-risk Areas – Supplement on Tin, Tantalum and Tungsten" of the Organization for Economic Cooperation and Development (OECD).

Based on these principles:

1. We have an internal management system that supports due diligence in the mineral supply chain, seeks continuous improvement, and is based on the five steps recommended by the OECD.
2. We implement processes to consistently identify and assess risks related to the mining, transportation, and trading of minerals, and we apply appropriate controls to respond to the risks identified.
3. We promote respect for human rights in our activities and supply chain. In this regard, we do not tolerate any form of forced labor, torture, child labor, sexual violence, war crimes, or similar acts; nor do we benefit from, contribute to, or facilitate—directly or through third parties—inhumane and degrading treatment, crimes against humanity, genocide, or other serious human rights abuses set forth in Annex II of the OECD guidelines.
4. Our interaction with law enforcement agencies and public and private security forces is based on the Voluntary Principles on Security and Human Rights. We do not, directly or indirectly, support public or private security forces that illegally control mines, transportation routes, and/or actors in the mineral supply chain.
5. We do not fund or support – either directly or indirectly – any conflicts, armed groups, and/or terrorist activities through the mining, transport, or trade of minerals.
6. We ensure ethical and transparent conduct. We do not engage in any form of corruption, including the act of trying to conceal the source of minerals. Similarly, we support efforts that effectively eliminate money laundering or financing of terrorism.
7. We support the Extractive Industry Transparency Initiative (EITI). We are convinced that transparency strengthens relationships among the government, companies, and civil society, builds trust, and contributes to the fight against corruption. In this regard, we ensure that all taxes, fees, and payments related to the mining, trade, and export of minerals are disclosed and paid in accordance with current applicable laws.
8. We provide training and disseminate our due diligence policies and practices internally and externally. We also incorporate these matters in the contracts or agreements with our mineral supply chain.
9. We have complaint mechanisms, such as our Integrity Channel, which allow us to respond to the concerns of our employees and third parties and take timely measures to address risks.

In the event that the company identifies suppliers in our mineral supply chain that fail to comply with this policy, we will make every effort to implement corrective action within six months. If that is not possible, or if the company detects reasonable risks of serious human rights abuses, funding of armed or terrorist groups, or participation in corrupt or money laundering practices, the commercial relationship will be suspended.

This policy will be reviewed and updated every three (3) years or before if organizational changes take place in our operations or projects.

Lima, February 5, 2024


Juan Luis Kruger Sayán
Chief Executive Officer