

Corporate Conflict of Interest Policy

This Corporate Conflict of Interest Policy sets forth the commitments and guidelines to prevent and adequately deal with real, potential or apparent conflicts of interest that directors and employees may have with other employees and/or customers, suppliers, contractors and/or third parties in general who have a relationship with Minsur.

The Policy hereof is part of our Corporate Compliance System and 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 transparency at all times, without prioritizing individual interests over Minsur's collective interests. Our culture is promoted by our Board of Directors, General Management, Compliance Officer and the leaders of our organization.
2. Promote the timely identification of any conflict of interests involving our directors, employees, customers, suppliers, contractors and/or third parties in general, at the beginning and throughout their relationship with Minsur.
3. Keep our employees trained and updated on general and specific situations that could constitute a real, potential or apparent conflict of interest.
4. Establish and keep an updated framework of action through our Conflict-of-interest procedure, which prescribes that any employee who identifies a real, potential or apparent conflict of interest, must report it in a timely manner through the channels established therefor.
5. Monitor changes that may occur in situations declared as conflict of interest and/or the circumstances that led to them, in order to warn and timely address any deviation that could negatively affect the collective interests of Minsur.
6. Punish the failure to report a real or potential conflict of interest as soon as the employee and/or strategic partner becomes aware of it.

Minsur values the commitment of all our employees and strategic partners to acting with transparency and integrity, when managing conflicts of interest that may arise when carrying out activities concerning our company.

Lima, September 2022


Juan Luis Kruger
General Manager