

CORPORATE FISCAL POLICY

The fiscal policy of Minsur S.A. and its subsidiaries (hereinafter, the company) is based on transparency, prudence and free competition, both when performing our economic activities with third parties and with related companies, aiming at implementing the best tax practices and complying with the Organization for Economic Cooperation and Development (OECD) guidelines, and those of the National Superintendency of Customs and Tax Administration (SUNAT – Peruvian Tax authority). This is our commitment as a company, and that of our leaders and shareholders.

Our performance is guided by nine principles of the OECD's Action Plan on Base Erosion and Profit Shifting (BEPS) that are detailed below:

- I. The company's tax decisions are linked to the payment of taxes in all jurisdictions where it performs its economic activity.
- II. The company uses structures with enough economic substance.
- III. The company makes reasonable interpretations of tax rules and double taxation treaties.
- IV. The company has established a transfer pricing policy for transactions among related parties, which is based on the principles of free competition.
- V. The company is actively working to adapt to the globalized environment, to address the challenges posed by the digital economy, including tax matters.
- VI. The company promotes a reciprocally cooperative relationship with the tax authorities, which is established because of the company's activities. It is based on the principles of transparency, mutual trust, good faith, and loyalty between the parties.
- VII. Paying taxes pursuant to applicable laws is a significant part of the company's contribution in the countries where it operates.
- VIII. The company promotes a transparent, clear, and responsible communication of its main fiscal magnitudes, by reporting to its stakeholders the relevant tax payment information.
- IX. The development of the principles exposed above shall govern the company's tax matters. They shall be implemented by the Direction of Finances by establishing control mechanisms and internal regulations.

Lima, July 09, 2020



Juan Luis Kruger Sayán
General Manager