

Policy for responsible supply chain of minerals

The policy herein establishes the commitments and general guidelines of Minsur S.A, its subsidiaries and related companies to ensure proper due diligence systems are in place to address risks in the supply chain of minerals sourced from conflict-affected or high-risk areas.

Currently Minsur does not source minerals from third parties, since the concentrate we process comes entirely from our mines in Peru and Brazil. However, should this situation change, we have implemented a set of policies and procedures that ensure a responsible and conflict-free supply.

These guidelines are consistent with our internal policies, such as our *Code of Ethics and Conduct for Suppliers*, *Human Rights Policy*, *Anti-corruption and Anti-bribery 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 constantly identify and assess risks in our mineral supply chain, and we apply appropriate controls to respond to the risks identified.
3. 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.
4. We promote respect for human rights in our activities and value chain. In this regard, we do not tolerate any form of forced labor, torture, child labor, sexual violence, or other related crimes. Furthermore, our interaction with law enforcement agencies and private security forces abides by the Voluntary Principles on Security and Human Rights.
5. 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. We do not fund —either directly or indirectly— any activities that may contribute to money laundering or the financing of terrorism.
6. We support the Extractive Industry Transparency Initiative (EITI). We are convinced that transparency strengthens the relationships between the State, 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.
7. We disseminate our due diligence policies and practices internally, and externally through our contracts or agreements with suppliers involved in our mineral supply chain.
8. 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 relevant actions to address risks.

In the event that the company identifies suppliers and/or third parties related to our mineral supply chain that fail to comply with this policy, we will make every effort to implement corrective action in the short term. If it is not possible, the commercial relationship shall be suspended.


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