

ORYGEN SUPPLIERS' CODE OF CONDUCT

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1. Introduction

At Orygen, we are committed to the responsible procurement of goods and services, seeking business relationships based on integrity, respect for human rights, environmental protection and transparency. For this reason, we have defined this Supplier Code of Conduct (hereinafter the "Code"), which sets out the minimum mandatory requirements for all our suppliers, subcontractors, partners and business associates.

Any material breach of this Code shall be considered a serious breach and may result in the termination of the contractual relationship with The Company.

If any provision of this Code conflicts with local laws, the more stringent standard must be applied. For enquiries, please contact Orygen through the contact channels provided.

2. Applicability

This Code applies to all suppliers, subcontractors, agents, distributors, consultants and their respective affiliates who provide goods and/or services to Orygen. Suppliers are expected to transmit these standards to their own supply chain and apply similar principles with their business partners.

3. Compliance with International Standards and Best Practices

Orygen supports and aligns itself with the principles set out in the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, as well as key conventions relating to child labour, forced labour, discrimination and freedom of association. We also promote the OECD Guidelines for Multinational Enterprises and the 10 Principles of the United Nations Global Compact.

Suppliers are expected to understand and align with these standards and applicable local regulations.

4. Mandatory Requirements for All Suppliers

4.1 Legal Compliance

Suppliers must comply with all applicable local and international laws and regulations in the countries where they operate. This includes regulations on international trade, data protection, competition, exports and sanctions. Suppliers must also ensure that they obtain, maintain and update all permits, licenses and registrations necessary to operate legally.

4.2 Business Integrity

Anti-corruption and bribery:

- Suppliers must not offer, promise, give or accept bribes, illegal commissions or any other improper benefits, whether to public officials or third parties, to influence business or government decisions.
- Any request or expectation of improper payment must be firmly rejected and reported immediately to Orygen's compliance team.
- All financial records relating to Orygen must be maintained in a clear, accurate and complete manner, accurately reflecting all transactions.

Gifts and hospitality:

- Any gifts or hospitality offered to Orygen employees must have a legitimate business purpose, and be modest, infrequent and in compliance with local laws.
- Under no circumstances should gifts or benefits be offered during bidding processes, contract renegotiations or as an incentive to obtain favourable treatment.

Conflicts of interest:

- Suppliers must identify and avoid any situation where their personal, financial or other interests may conflict with Orygen's interests.
- If a supplier discovers a potential conflict of interest, it must inform Orygen without delay and take steps to mitigate it.

Fraud and financial crimes:

- Engaging in fraudulent activities, money laundering, embezzlement or misappropriation of funds or falsification of financial information in connection with transactions with Orygen is strictly prohibited.

4.3 Human Rights and Social Responsibility**Health and safety:**

- Suppliers must provide a safe and healthy working environment, in compliance with local regulations and ILO occupational health and safety standards.
- Safety policies must be implemented, risk assessments must be performed, frequent training must be offered and the necessary personal protective equipment (PPE) must be provided.
- If the supplier offers accommodation to its employees, it must be safe, hygienic, accessible, and respect privacy, gender differences and cultural customs.

Child and forced labour:

- Under no circumstances should minors under 18 years of age or minors who have not reached the minimum legal working age according to national legislation be employed.
- Forced labour, human trafficking or any form of physical, economic or psychological coercion is not tolerated.
- Suppliers must verify the age of all employees through official documentation and establish clear protocols for action in case of detection of child labour.

Working conditions:

- All workers must receive a fair wage that complies, at a minimum, with the applicable legal minimum wage or that established by collective bargaining agreements.
- Working hours must comply with local legislation and ensure adequate rest breaks, including at least one day off every six days worked.
- All social benefits required by law must be provided and detailed and understandable pay vouchers must be issued to workers.

Freedom of association and collective bargaining:

- Suppliers must respect the right of workers to form and join trade unions, freely elect their representatives and bargain collectively without fear of retaliation.
- They should promote an environment of open and constructive dialogue between employers and employees.

No discrimination or harassment:

- All employees must be treated with dignity and respect. Discrimination in employment on the basis of race, gender, age, religion, sexual orientation, disability or other personal characteristics is strictly prohibited.
- Suppliers must prevent and sanction all forms of harassment, whether physical, verbal, sexual or psychological.

Community participation:

- Suppliers shall act with respect towards local communities, including indigenous peoples, avoiding negative impacts and ensuring an open and equitable dialogue with affected people.
- Accessible mechanisms should be established to receive and resolve community complaints.

Use of armed security:

- In the event that the use of armed security personnel is required, the supplier must inform Orygen, conduct a risk assessment and ensure that the personnel act in accordance with the law and international human rights standards.

Conflict minerals:

- Suppliers must ensure that the sourcing of minerals such as silicon, tantalum, tin, tungsten and gold does not contribute to the financing of armed conflict or human rights violations.
- They should follow the OECD guidelines on responsible supply chains in conflict zones.

4.4 Environmental Protection

- Suppliers must comply with all applicable environmental laws and regulations in their jurisdiction and with specific requirements established by Orygen.
- They are expected to operate under an effective environmental management system that facilitates continuous improvement and prepares responses to environmental emergencies.
- They must take measures to minimize their environmental impact, including the reduction of emissions, the efficient use of resources such as water and energy, and the adoption of reuse and recycling practices.
- All hazardous substances used must be properly labelled, stored and handled according to applicable regulations. The use of less toxic alternatives should be prioritised whenever possible.
- Environmental incidents, including near misses, should be reported promptly to Orygen.

4.5 Fair Business Practices

Intellectual property and confidentiality:

- Suppliers must protect Orygen's intellectual property and confidential information, using appropriate technical and administrative controls to prevent loss, leakage or misuse.
- In the event of a security breach or incident, the supplier must immediately notify Orygen.

Data protection:

- Suppliers must ensure the integrity and security of the personal data they process on behalf of Orygen by complying with all applicable privacy laws.
- Any use or transfer of data must be done in a transparent, lawful and secure manner.

Competition:

- Suppliers must respect free competition and avoid anti-competitive practices such as price-fixing agreements, market sharing or abuse of dominant position.

Sanctions and exports:

- They must identify and comply with all applicable export control and sanctions laws and regulations, including those issued by international agencies such as OFAC.
- It is the supplier's responsibility to perform due diligence to avoid links with sanctioned entities or individuals.

4.6 Records and Management Systems

- Suppliers must have adequate internal systems in place to manage risks related to human rights, the environment and business ethics in their supply chain.
- They must implement clear policies, training programs, complaint management systems and oversight mechanisms appropriate to their size and level of risk.
- They are also expected to have business continuity plans in place to respond to disruptions caused by natural disasters, cyber-attacks or other events.

4.7 Audit

- Orygen reserves the right to request records or conduct audits to verify compliance with this Code.
- Audits may be carried out on the basis of risk criteria or on the basis of well-founded suspicions. Suppliers must cooperate fully in all verification activities.

5. Whistleblowing Mechanisms and Channels

- Suppliers must establish secure, anonymous and accessible channels for their employees to report irregularities without fear of retaliation.
- Reports should be investigated in an objective, confidential and timely manner.

- Suppliers and employees are also encouraged to use Orygen's whistleblowing system to report any violations related to this Code.
- Orygen guarantees that all reports will be treated confidentially and that no retaliation against good faith whistleblowers will be tolerated.

6. Consequences of Non-Compliance

- Orygen reserves the right to terminate the contractual relationship with immediate effect if serious or repeated violations of the principles of this Code are detected, especially if they affect integrity, legality, human rights or safety.
- In the case of remediable non-compliances, a corrective action plan with defined deadlines may be required. Failure to comply with the plan may result in termination of the contract.

7. Compliance Commitment

By signing this Supplier Code of Conduct, the supplier confirms having read, understood and accepted it. It also undertakes to comply with all provisions in its operations and to transmit these requirements to its own supply chain.

Supplier Business Name: _____

Legal Representative: _____

Position: _____

Signature: _____

Date: _____

This Code of Conduct for Suppliers seeks to foster business relationships based on ethics, transparency and mutual respect, promoting sustainable and responsible development throughout the value chain.

At Orygen, we count on your commitment and collaboration to meet these standards.