

Policy No. 178

Version No. 1 date: 07/16/2024

Subject: Anti-Corruption Policy - Zero Tolerance for Corruption**Application Areas**Staff Function: *Legal, Corporate Affairs and Compliance* -Service Function: -

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BOARD OF DIRECTORS

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1. OBJECTIVES OF THE DOCUMENT AND SCOPE OF APPLICATION

1.1 INTRODUCTION

At Orygen Peru S.A.A. ("Orygen" or the "Company"), integrity, honesty and transparency are fundamental principles that guide our business conduct. These values are enshrined in our Code of Ethics and form the basis of all our relationships with customers, suppliers, authorities and other stakeholders.

With a firm and categorical commitment, the Company rejects all forms of corruption, whether direct or indirect, public or private. In that sense, this Anti-Corruption Policy - Zero Tolerance to Corruption (the "Policy") establishes the principles, guidelines and measures that all workers, managers, business partners and related third parties must respect and apply without exception.

This Policy is part of the Company's Criminal Risk Prevention Model (the "CRMP") and aims to promote a culture of integrity that allows us to prevent, detect and respond effectively to any corrupt conduct, ensuring legal compliance and maintaining trust with all our business partners.

Acting with integrity is a key responsibility for the Company to build sustainable relationships and preserve Orygen's reputation. No commercial objective or economic benefit can be at odds with or distant from legal compliance and ethical behaviour.

1.2 OBJECTIVE

The objective of this Policy is to establish Orygen's commitment to the prevention, detection and sanction of any act of corruption, whether public or private, direct or indirect.

It also seeks to promote a culture of integrity and compliance, ensuring that all employees and related third parties act ethically and in strict compliance with current regulations, including Law No. 30424, its regulations and amendments.

1.3 SCOPE

This Policy is mandatory for all Company Workers, including managers, executives, operational workers, as well as for business partners, external third parties and, in general, any third party acting on behalf of or representing the organisation.

It applies to all activities and operations carried out by the Company, both nationally and internationally, without distinction of department, hierarchy or geographical location.

The scope of this Policy is general, although Orygen reserves the right to adapt or supplement it to ensure compliance with applicable regulations in other jurisdictions where it maintains relevant operations or business relationships.

The criteria and guidelines set forth in this Policy are mandatory for all companies in which the Company holds a majority interest, exercises control or has direct responsibility for their management, without prejudice to respecting the corporate structures and management bodies of each entity. These may, in turn, adopt supplementary prevention measures that they consider more appropriate to their operational or sectoral reality.

2. DOCUMENT VERSION MANAGEMENT

Version	Data	Main changes description
1	07/16/2025	Issuance of PL 178 Anti-Corruption Policy - Zero Tolerance to Corruption.

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3. PROCESS DESCRIPTION

3.1 GENERAL GUIDELINES

The Company maintains a policy of **zero tolerance for any act of corruption**, in any form, whether public or private, direct or indirect. In this regard, all workers, managers, business partners and third parties linked to the organisation must be aware of and comply with the following general guidelines:

3.1.1. Prohibition of Bribery

It is strictly prohibited to offer, promise, authorise, deliver or accept any kind of bribe, whether in money, goods or an Undue Benefit, with the objective of obtaining undue advantages in the exercise of commercial or institutional activities. This prohibition applies even when such actions are intended for personal benefit, or for the benefit of family members, associates or acquaintances.

Any attempt, offer or request for bribery or corruption must be reported immediately to the direct superior and to the Prevention Officer through the corresponding channel. Business Partners must also report these situations through the Company's whistleblowing channel.

3.1.2. Donations to Political Parties

Contributions to candidates, officials, political propaganda events and any contribution aimed at unduly influencing public or regulatory decisions are prohibited. The Company may only make contributions or sponsorships to political organisations in Peru when (i) they are expressly permitted by Law 28094 as amended (including Law 32254) and by the Regulations on the Financing and Oversight of Political Party Funds of the National Office of Electoral Processes (Oficina Nacional de Procesos Electorales, ONPE); (ii) they fully comply with the limits, prohibitions, banking formalities and traceability required by such regulations; and (iii) they previously have a favourable report from Legal Management, Corporate Affairs and Compliance, counterparty analysis of the recipient, certification of absence of conflict of interest and approval from the Board of Directors.

3.1.3. Charity Donations and Sponsorships

All sponsorship or support of social, environmental, cultural, scientific or educational initiatives shall be evaluated based on criteria of transparency, relevance and absence of conflicts of interest. These actions must be formally documented, in line with current internal protocols, and may not be used as a means of unduly influencing the decisions of third parties. The management of all donations made to charitable organizations and sponsorships will be handled in accordance with the guidelines established in PO No. 87 - Management of Donations and PO No. 91 - Management of Sponsorships.

3.1.4 Favourable Treatment

Orygen expressly prohibits any form of favoured treatment or facilitation payment intended to speed up or expedite routine acts, formalities, procedures or services to be performed by third parties in the performance of their duties. This restriction includes monetary payments as well as the delivery of goods, favours or any other type of Improper Benefit.

In the event of any offer or request for this type of practice, Workers must inform their direct superior and the Prevention Officer immediately. Business Partners must also report these situations through the Company's whistleblowing channel.

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3.1.5. Gifts, Presents and Favours

It is not permitted to offer or accept gifts, presents or favours that exceed legitimate business practices or courtesy, or that could reasonably be interpreted or perceived as a way to influence decision-making, obtain undue advantage or compromise independence of judgment. In this way, we seek to prevent any type of corruption, conflict of interest or influence peddling.

This prohibition applies especially to relationships with Public Officials, auditors, directors, potential customers and customers, suppliers and any other Business Partners. The giving of gifts by the Company must respond to institutional criteria, transparency, good faith and be oriented to promote Orygen's corporate image and must be handled in accordance with the guidelines established in PL No. 88 Gifts and Hospitality. Any gift that does not comply with these conditions must be reported to and evaluated by the Prevention Officer.

3.2 SPECIFIC GUIDELINES

The effective implementation of this Policy requires the active participation of the entire organisation and related third parties. The following specific guidelines detail the key areas of application and responsibility:

3.2.1. Relationship with Subsidiaries or Affiliated Companies

Orygen will promote the adoption of this Policy and the Code of Ethics in all companies in which it has a significant shareholding or relationship. In the case of new partnerships or acquisitions, the ability of the related company to comply with the Company's anti-corruption principles will be assessed in advance.

The adoption of this Policy or, failing that, the implementation of an equivalent document may be proposed.

3.2.2. Relationship with Business Partners

No Business Partner (whether an individual or a legal entity) may represent the Company, unless expressly authorised in writing. For this purpose, an express commitment to comply with this Policy and the Code of Ethics must be signed. Likewise, contractual conditions, including fees, must be justified, documented and aligned with market practices.

Orygen reserves the right to terminate the relationship with third parties who violate this Policy, subject to applicable law. This authority shall be reflected in all contracts and other binding documents entered into between the Company and the Business Partners. In addition, and when applicable, the Business Partner may be required to provide evidence of its controls or prevention model to confirm that it is aligned with the Company's ethical and business standards.

3.2.3. Purchasing and Sales Processes

Employees who participate in purchase and supply processes must receive periodic and specific training, organised by the Legal, Corporate Affairs and Compliance Management with the support of the People and Culture Management, in order to ensure transparency in the selection and contracting of Business Partners. Likewise, the Company will choose to engage with Business Partners that have implemented adequate controls for the prevention of corruption and bribery.

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3.2.4. Training and Awareness

The Company will develop specific training programs on the principles, risks and procedures related to the fight against corruption. Training shall be periodic, differentiated according to the level of responsibility and mandatory for all personnel. If requested, support may be provided to third parties interested in implementing similar measures that contribute to the fight against corruption.

3.2.5. Reporting Mechanisms

All Workers, Business Partners and related third parties have an obligation to report any suspicion or evidence of acts of corruption or non-compliance with this Policy. Reports may be submitted securely and confidentially through the whistleblowing channel or through a communication addressed to the Legal, Corporate Affairs and Compliance Management.

It is important to note that the identity of the reporter will be protected in accordance with applicable law, ensuring that there will be no retaliation.

For more information on accessing the whistleblowing channel, please refer to PL No. 93 on Whistleblowing Management.

3.2.6. Internal Control and Audit

Each management of the Company shall be responsible for establishing control mechanisms to ensure compliance with this Policy during the execution and development of internal processes within its scope of action.

The Internal Audit team will periodically evaluate the effectiveness of the controls implemented, issuing recommendations for continuous improvement.

The main compliance actions will be reflected in the Company's sustainability report, as a sign of the institutional commitment to integrity.

3.3. RESPONSIBILITIES

The effective compliance of this Policy requires the active and coordinated participation of all levels of the Company. The responsibilities according to the role of each key player are detailed below:

3.3.1. Orygen Workers:

- Know and comply with this Policy, as well as with the legal regulations applicable in the relevant jurisdiction.
- Refrain from participating in acts of corruption, either directly or indirectly.
- Report in a timely manner any suspicious situation or potential non-compliance with CRPM guidelines.
- Consult your direct superior, the Legal, Corporate Affairs and Compliance Management or the Prevention Officer if you have any doubts about the application of this Policy.
- Actively participate in assigned training programs.

3.3.2 Managers and Team Leaders:

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- Promote knowledge of and compliance with this Policy among the teams in charge.
- Report to the Legal, Corporate Affairs and Compliance Management or to the Prevention Officer any doubt, risk or incident detected.
- Participate in training activities to understand the impact that these relationships can have on the Company's business.

3.3.3. People and Culture Management:

- Disseminate this Policy effectively throughout the Company, ensuring its incorporation in the induction and continuous training processes.
- Coordinate with the Legal, Corporate Affairs and Compliance Management to carry out specific training for workers who interact with Public Officials.

3.3.4. Legal, Corporate Affairs and Compliance Management:

- Advise on regulatory interpretation and resolve queries on the legal framework applicable to this Policy.
- Support in the management of complex situations or legal risks arising from contact with the public administration.
- Collaborate in the review and update of this Policy when relevant regulatory changes occur.
- Manage reported events or situations contrary to the Policy, received through the Whistleblowing Channel or any other communication channel or source. The research will be supported by other departments of the Company and, if necessary, by external experts.

3.3.5. Internal Audit

- Periodically verify compliance with this Policy as part of internal control.
- Recommend, in coordination with other departments, corrective measures for possible deviations.

3.3.6. Prevention Officer:

- Promote periodic reviews, as well as updates or improvements to the Policy when regulatory gaps or regulatory changes are identified.
- Channel and resolve doubts related to this Policy, especially in unforeseen or high-risk situations.
- Coordinate with the different departments involved for the adequate dissemination, training and control of its application.

3.4 SANCTIONS FOR NON-COMPLIANCE AND EXCEPTIONS

The Compliance of the guidelines set forth in this Policy is mandatory for all Workers, regardless of their role or position within Orygen. Non-compliance with any of its provisions shall be considered a serious offense and may result in the application of disciplinary measures, without prejudice to other civil, administrative or criminal liabilities that may apply.

Applicable sanctions may include verbal or written warnings, suspension, termination of employment or contractual relationship, and/or legal action depending on the seriousness of the matter. In the case of Business Partners, non-compliance may result in termination of contracts, restrictions on participation in commercial bidding processes and/or corresponding legal actions.

No exceptions to the provisions of this Policy may be made without duly documented and authorised justification. Any exception must have the written approval of the Prevention Officer, in coordination with the Legal, Corporate Affairs and Compliance Management.

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3.5 ENTRY INTO FORCE AND EFFECTIVENESS

This Policy entry into force as of its formal approval by the Board of Directors of Orygen Perú S.A.A., and its contents shall be immediately applicable to all Workers, as well as to Business Partners who interact with Public Officials on behalf of the Company. The Policy shall remain in effect until the Company expressly issues a new or updated Policy.

4. UNITS RESPONSIBLE FOR THE DOCUMENT

Responsible for preparing the document:

- Legal, Corporate Affairs and Compliance Management

Responsible for authorising the document:

- Board of Directors
- General Manager
- People & Culture

5. REFERENCES

- Criminal Risk Prevention Manual
- PO No. 1 Organisational Document Management
- PL No. 88 Gifts and Hospitality
- PO No. 87 Donations Management
- PO No. 91 Sponsorship Management
- PL No. 93 Report Management
- Internal Labour Regulations

6. POSITION OF THE ORGANIZATIONAL PROCESS IN THE PROCESS TAXONOMY

Area Process: Legal, Corporate Affairs and Compliance Management Macro

Process: Compliance

7. DEFINITIONS AND ACRONYMS

Acronyms and keywords	Description
Senior Management	Refers to the General Management of Orygen Perú S.A.A.
Orygen or the Company	Refers to Orygen Perú S.A.A.
Worker or Workers	Refers to any individual who: (i) renders services to an employer under a subordinate relationship, in exchange for remuneration as consideration, subject to any labour regime, regardless of the type of employment contract; or, (ii) performs training activities under any type of training modalities regulated by the labour legislation in force.

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Undue Benefit	Any advantage, gift, present, payment, favour, promise, offer or incentive -whether in cash or in kind- that does not correspond legally or contractually, and that has the purpose of improperly influencing the decisions, actions or omissions of a Public Official or other counterparty. It may include personal, family or professional benefits, and its delivery or receipt constitutes a prohibited practice under this Policy and applicable law.
Public Officials	Refers to any official, servant or worker of any Government Entity, including without limitation: i) any official, worker, agent, director or representative of a Government Entity, Public International Organization (i.e. United Nations, World Bank, etc.) or of a political party, ii) any Close Relative of any of the persons included in numeral i) above, iii) Those who are included in the administrative career, iv) Those who hold political or trust positions, even if arising from popular election, v) Anyone who, regardless of the labour regime in which they are, (vi) Administrators and custodians of funds seized or deposited by a competent authority, even if belonging to private individuals, (vii) Members of the Armed Forces and National Police, International civil officials and, (viii) Others indicated in the Political Constitution of Peru and other applicable regulations.
Criminal Risk Prevention Model (CRPM)	It is the Model established by Orygen in accordance with Law No. 30424, which aims to identify, evaluate and mitigate the risks associated with the crimes contemplated within the scope of the aforementioned law.
Business Partners	Individuals or legal entity with whom the Company establishes a commercial, contractual or strategic relationship for the joint development of activities, businesses, projects or services. Includes, among others, suppliers, customers, contractors, agents, strategic allies, consortiums or joint ventures, and any third party hired to act on behalf of or in the name of the Company as consultants, intermediaries, managers, advisors and other professionals.
Favourable Treatment	Any type of undue advantage, benefit or privilege that a person or organisation receives in a process, decision or business relationship, in contravention of the principles of fairness, legality and transparency.
Prevention Officer	Person in the Legal, Corporate Affairs and Compliance Management unit responsible for the supervision, operation and compliance of the Criminal Risk Prevention Model and for providing support for the implementation, supervision and review of controls, as well as for updating the same.
Bribery	Delivery or offer of an undue advantage to a public or private official for the purpose of influencing their decisions or actions, in exchange for an advantage for the bribe giver or for a third party.
Corruption	Any conduct by which an undue advantage is offered, promised, given, solicited or accepted, directly or indirectly, for oneself or for a third party, for the purpose of influencing a decision or action

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	to be taken in the exercise of a public or private function.
Gift, Present or Favour	Any good, service, attention or benefit provided-whether of economic value or not-without expectation of consideration in return, and which may be perceived as an attempt to influence a decision or generate a reciprocal obligation.
Team Leaders	Assistant Managers, Chiefs, Managers and Coordinators who are in charge of managing a team of people.