

Subject: Privacy and Personal Data Processing Policy**Application Areas**

Staff Function: Legal, Corporate Affairs and Compliance -

Service Function: -

Business Line: -

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1. INTRODUCTION

At Orygen Perú S.A.A. (the “Company”), we recognise the importance of the fundamental right to the protection of Personal Data; therefore, we have developed the general guidelines that govern the processing of Personal Data entrusted within the framework of labour, contractual, commercial, legal or other relationships of diverse nature that are maintained with the Company.

We reaffirm our commitment to the privacy and security of such information, guaranteeing its processing in highly secure and confidential physical and digital environments.

Acting with integrity and diligence is an essential responsibility to build sustainable relationships and preserve the Company's reputation.

2. OBJECTIVES OF THE DOCUMENT AND SCOPE OF APPLICATION

The objective of this Privacy and Personal Data Processing Policy (hereinafter, “Policy”) is to inform the Data Subjects about the general and specific guidelines applicable to the processing and possible transfer of their data, as well as the purpose for which they are collected, the retention period and the procedures established by the Company for the exercise of their rights, in accordance with current regulations.

This Policy is mandatory for all cases in which the Processing of Personal Data is carried out in the Company.

Therefore, all Company Workers, as well as business partners and, in general, any Third Party acting on behalf of or representing the organisation, are obliged to follow the guidelines described in this document.

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.

Notwithstanding the foregoing, the Company, as Holder of the Personal Data banks covered this Policy and being data controller of the information contained in such banks, hereby notifies its interested parties that the Company is domiciled at Paseo del Bosque No. 500 Urb. Chacarilla, district of San Borja, province and department of Lima.

This document shall be implemented and applied in accordance with applicable laws, regulations and governance standards, which in any case prevail over the provisions contained in this document.

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3. DOCUMENT VERSION MANAGEMENT

Version	Data	Description of the main changes
1	08/XX/2025	Publication of PL No. 73 Privacy and Personal Data Processing Policy

4. PROCESS DESCRIPTION**1. GUIDING PRINCIPLES**

The Company respects the guiding principles established in the current regulations on the protection of Personal Data. These are mainly the principle of legality, consent, purpose, proportionality, quality, security and the principle of adequate level of protection.

- 1.1. Principle of legality:** the Company shall process Personal Data in accordance with the provisions of the applicable legislation in force.
- 1.2. Principle of consent:** the Company shall process Personal Data when the owner of the personal data has given their free, prior, express, informed and unequivocal consent; or in the cases expressly provided by law, in which such consent is not required.
- 1.3. Principle of purpose:** the Company shall process Personal Data for a specific, previously communicated, explicit and lawful purpose. Such processing may not be extended to a different purpose, excluding the cases of activities of historical, statistical or scientific value when a dissociation or anonymisation procedure is involved.
- 1.4. Principle of proportionality:** the Company shall verify that any Processing of Personal Data is adequate, relevant and not excessive to the purpose for which it was collected.
- 1.5. Principle of quality:** the Personal Data processed by the Company shall be true, accurate and, as far as possible, up to date, necessary, relevant and adequate with respect to the purpose for which it was collected. Likewise, they shall be retained guaranteeing their security and only for the time necessary to fulfil the purpose of the treatment.
- 1.6. Principle of security:** the Company adopts the technical, organisational and legal measures to ensure the security of the Personal Data under its processing. The security measures must be appropriate and proportionate to the processing to be carried out and the category of Personal Data involved.
- 1.7. Principle of adequate level of protection:** in the exceptional case of cross-border flow of Personal Data, the Company guarantees a sufficient level of protection for the Personal Data to be processed or, at least, comparable to that provided by the applicable legislation or international standards on the matter.
- 1.8. Principle of availability of remedies:** the Company guarantees its predisposition to collaborate in the administrative or jurisdictional channels to which the holder of Personal Data may resort to claim or assert their rights, when they consider that the latter have been violated during the processing by the Company.

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2. GENERAL PROCESSING GUIDELINES**2.1. Personal Data under Orygen's processing**

The provision of the services provided by the Company requires the collection and processing of Personal Data from the persons indicated in this section, who in turn agree to provide all Personal Data indicated in this section, including but not limited to the following:

- (i) names and surnames;
- (ii) number and type of identity document;
- (iii) Unique Taxpayer Registration Number;
- (iv) residential address;
- (v) e-mail address;
- (vi) landline and/or cell phone number;
- (vii) date of birth;
- (viii) work centre;
- (ix) image, and, any data of an identifying, personal, economic, financial and/or insurance, social, sensitive nature, and, in general, all data, information, operations and references to which the Company may have access in the normal course of its activities and/or based on the commercial, contractual and/or legal relationship through any channel, either because they have been provided directly to the Company or the Company has obtained them in another lawful way (e.g., public sources), and which may qualify as Personal Data under applicable law.

In this regard, in accordance with Article 14.5 of the Personal Data Protection Law, it is reiterated that Consent is not required for the processing of Personal Data that is necessary for the preparation, conclusion and execution of the contractual and/or legal relationship that the Data Subjects have with the Company.

In line with the above, as part of Orygen's activities and for the purposes indicated in this Policy, Orygen collects and processes the Personal Data of the following persons, which are stored in the corresponding databases of the National Registry for the Protection of Personal Data:

- Applicants
- Workers
- Shareholders
- Directors
- Potential customers (their legal representatives and/or shareholders)
- Customers (their legal representatives and/or shareholders)
- Suppliers (and, if applicable, their legal representatives and/or shareholders)
- Visitors
- Video surveillance
- Social responsibility
- Claims attention
- Reporting Channel

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2.2. Purpose of processing and retention period of Personal Data

The Company processes and retains Personal Data collected in accordance with this section and taking into account the following:

- The detailed lists below are not exhaustive, but merely illustrative, and generally address the main purpose of the processing of Personal Data collected by Orygen in the course of developing the relationships generated through its operations and activities.
- Personal Data is retained only for the time necessary to fulfil the purpose for which it was collected, after which it is deleted. As a general rule, the appropriate storage time and the concept of suppression is established prior to Consent. For this reason, the Company estimates in this section the term that would be relevant according to its experience.

2.2.1. Applicants

The Company processes the Personal Data of the applicants, among others, for the following purposes:

- General business purposes.
- Evaluation of skills.
- Management of selection processes.
- Statistical, historical or scientific purposes.
- Profile analysis for potential hires.

Personal Data shall be retained during the application process and thereafter for a period not to exceed ten (10) years in the event that the Company believes that the Personal Data will be useful for a future application process.

However, the applicant may request the deletion of their Personal Data at any time, to which the Company will agree, provided that the Company considers that this will not affect its rights or obligations in the future, or that it is not data that the Company requires for statistical or internal control purposes.

2.2.2. Workers

The Company processes the Personal Data of the workers, among others, for the following purposes:

- General business purposes.
- Collection and classification of information from workers and their families for the management of people management processes.
- Compliance with applicable labour and tax laws.
- Management, supervision and sanctioning of the employer.
- Commencement, execution, modification or termination of the existing employment relationship.
- Activities between workers, their families and the company to improve the work environment.
- Prevention of occupational hazards.
- Statistical, historical or scientific purposes.

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- Cultural, recreational and/or sports activities.
 - Union management.
 - Occupational medical evaluations and accident records.
 - Payment of remuneration.
 - Promotional purposes of the business (including digital content for dissemination in public access media).

The Personal Data shall be retained during the term of the employment and/or training relationship and, after this for an indefinite period of time, provided that such data is necessary for the Company to exercise its rights related to the employment and/or training relationship; otherwise, the Company will proceed to delete the Personal Data of its workers within a period not exceeding ten (10) years from the end of the employment and/or training relationship.

Notwithstanding the foregoing, once the employment relationship and/or training modalities have ended, the worker may request the immediate deletion of their Personal Data. In such case, the Company shall grant such request, provided that it considers that it will not affect the exercise of its rights or obligations in the future.

2.2.3. Shareholders

The Company processes the Personal Data of the shareholders, among others, for the following purposes:

- Compliance with applicable legal provisions.
- Registration of the Share Registration Book and holding of General Shareholders' Meetings.
- Dividend payments.
- Promotional purposes of the business.
- Statistical, historical or scientific purposes.

The Personal Data shall be retained for the period in which the shareholders retain such status and thereafter for an indefinite period as long as such data is necessary for the Company to exercise its rights.

However, once the shareholders cease to be shareholders, they may request the deletion of their Personal Data. In such a case, the Company shall grant the request, provided that it considers that this will not affect the exercise of its rights and obligations in the future.

2.2.4. Directors

The Company processes the Personal Data of the directors, among others, for the following purposes:

- Compliance with applicable legal provisions.
- Registration and holding of meetings.
- Payment of allowances.
- Promotional purposes of the business.
- Statistical, historical or scientific purposes.

The Personal Data shall be retained for the period in which the directors retain such status and thereafter for an indefinite period as long as such data is necessary for the Company to exercise its rights.

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However, once the directors cease to be directors, they may request the deletion of their Personal Data. In such a case, the Company shall grant the request, provided that it considers that this will not affect the exercise of its rights and obligations in the future.

2.2.5. Potential customers (their legal representatives and/or shareholders)

The Company processes the Personal Data of the potential customers, among others, for the following purposes:

- General business purposes.
- Purposes foreseen in pre-agreements.
- Statistical, historical or scientific purposes.
- Promotional purposes of the business.

Personal Data shall be retained for a period of ten (10) years. However, the potential customer may request the deletion of such Personal Data at any time. In such a case, the Company shall grant the request, provided that it considers that this will not affect the exercise of its rights and obligations in the future.

2.2.6. Customers (their legal representatives and/or shareholders)

The Company processes the Personal Data of the customers, among others, for the following purposes:

- General business purposes.
- Commercial and customer service management.
- Accounting management and follow-up of monetary obligations.
- Returns.
- Sending notifications.
- Surveys.
- Statistical, historical or scientific purposes.
- Promotional purposes of the business.

The Personal Data shall be retained for the period in which a contractual relationship is maintained with the customer in question, and after this for an indefinite period provided that such data is necessary for the Company to exercise its rights; otherwise, such Personal Data shall be retained for a period not exceeding twenty (20) years.

Notwithstanding the foregoing, upon termination of the contractual relationship, the customer may request the immediate deletion of their Personal Data. In such case, the Company shall grant such request, provided that it considers that it will not affect the exercise of its rights and obligations in the future.

2.2.7. Suppliers (if applicable, their legal representatives and/or shareholders)

The Company processes the Personal Data of the suppliers, among others, for the following purposes:

- General business purposes.
- For registration and identification.
- Prevention of occupational hazards.
- Commercial and/or supplier list management.
- Security and access control to facilities.

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- Payment information.
 - Statistical, historical or scientific purposes.
 - Promotional purposes of the business.

The Personal Data shall be retained for the period that a contractual relationship is maintained with the respective supplier and after the termination of such relationship, for a period not exceeding twenty (20) years.

However, upon termination of the contractual relationship, the supplier may request the immediate deletion of such Personal Data. In such a case, the Company shall grant the request, provided that it considers that this will not affect the exercise of its rights and obligations in the future.

2.2.8. Visitors

The Company processes Personal Data of visitors accessing its facilities, among others, for the following purposes:

- Identify the purpose of the visit for security measures.
- Security and access control to the Company's facilities.
- Statistical, historical or scientific purposes.
- Promotional purposes of the business.

Personal Data will be retained for a maximum period of ten (10) years from the visit. Once the aforementioned conservation period has elapsed, and if there is no request from any authority to deliver or view the visitor's log, the documents will be eliminated.

2.2.9. Video surveillance

The Company processes the Personal Data of the video surveillance, among others, for the following purposes:

- Identification of persons entering the facilities for security measures.
- Security and access control to facilities.

Personal Data will be retained for a maximum period of sixty (60) business days. Once the aforementioned conservation period has elapsed, and if there is no request from any competent authority to deliver or view the contents of the recording, the files will be deleted, in accordance with the provisions of the legislation on the matter.

2.2.10. Social responsibility

The Company processes the Personal Data of the social responsibility, among others, for the following purposes:

- Cultural activities.
- Statistical, historical or scientific purposes.
- Sponsorships and donations.
- Social support.
- Institutional events.
- Development programs.

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- Use of image in the media.
 - Promotional purposes of the business.

Personal Data shall be retained for a period of ten (10) years. However, individuals whose Personal Data belong to this database may request the deletion of such Personal Data at any time. In such a case, the Company shall grant the request, provided that it considers that this will not affect the exercise of its rights and obligations in the future.

2.2.11. Claims Attention and Reporting Channel

The Company carries out the Processing of Personal Data for the attention of claims and reporting channels, among others, for the following purposes:

- Manage the attention, evaluation and prompt response to reports (in the case of non-anonymous report), claims and concerns received.
- Statistical, historical or scientific purposes.
- Claims management.
- Attention to reporting channels.

Personal Data shall be retained for a period of ten (10) years. However, individuals whose Personal Data belong to this database may request the deletion of such Personal Data at any time. In such a case, the Company shall grant the request, provided that it considers that this will not affect the exercise of its rights and obligations in the future.

3. SPECIFIC GUIDELINES FOR PROCESSING**3.1. Safety measures**

The Company shall be responsible for the Personal Data banks under its ownership and for the Personal Data contained therein. In order to prevent the loss, theft, misuse, unauthorized access or alteration of Personal Data, the Company adopts the legally required levels of security and data protection, as well as the technical means and measures available to it.

3.2. Notification of personal data security incidents

The Company shall notify without undue delay the competent authority of any Personal Data Security Incident in which large volumes of Personal Data are affected and/or exposed, in quantity or type of data or when it involves Sensitive Data or when there is an evident prejudice to rights or freedoms of the Data Subjects affected or exposed.

Likewise, the Company shall send the information related to the incident to the owners of the data affected by it.

3.3. Transfer of personal data to third parties

The Transfer of Personal Data to Third Parties is permitted as long as it is necessary to fulfil the purpose of the processing of Personal Data.

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By granting their Consent for the processing of Personal Data to the Company, the owner of such data agrees to the Transfer of such data to Third Parties.

For the perfection of such Transfer, the Company has implemented the appropriate organisational and technical security controls, thus guaranteeing the rights of the data subjects. Likewise, the Company includes in its contracts the relevant contractual standards that guarantee the continuity or improvement in the security of Personal Data.

The Transfer must be formalised through mechanisms that allow proof that the Owner of the Personal Data Database informed the Recipient of the Personal Data of the conditions under which the data subject consented to the processing.

3.4. Cross-border flow of personal data

The Owner of the Personal Data Database shall carry out the cross-border transfer of Personal Data only if the destination country maintains an adequate level of protection in accordance with the Personal Data Protection Regulations in force. If the destination country does not maintain an adequate level of protection, the sender of the cross-border transfer of Personal Data shall ensure that the processing of Personal Data is carried out in accordance with the minimum standards established by the local Personal Data Protection Regulations.

The Company, in its capacity as issuer or exporter, may avail itself of contractual clauses or other legal instruments establishing at least the same obligations to which it is subject, as well as the conditions under which the Personal Data Subject consented to the processing of their data. The model contractual clauses for the International Transfer of Personal Data approved and published by the National Authority for the Protection of Personal Data may be used.

3.5. Personal Data Officer

The Company has designated a Personal Data Officer in accordance with the provisions of the applicable legislation, whose contact information is available for the knowledge of the data subjects through the following e-mail: protecciondedatospersonales@orygen.com.

4. PROCEDURE FOR EXERCISING THE RIGHTS OF DATA SUBJECTS

The Data Subjects processed by Orygen may exercise their rights and access the procedures set forth in this document by sending their request or inquiries to:

Address:	Paseo del Bosque No. 500 Urb. Chacarilla - San
E-mail address:	protecciondedatospersonales@orygen.com

Regardless of the means of access to the exercise of rights, the Personal Data Subject must contemplate in their request:

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- Name of the personal data subject;
- Address or other means to receive a response;
- Documents proving your identity or legal representation;
- Clear and precise description of the data in respect of which you seek to exercise your rights;
- Other elements or documents that facilitate the location of the data subject of the procedure.

Requests shall be addressed in accordance with the manner and deadlines established by the applicable legislation. If the Personal Data Subject considers that they has not been attended to in the exercise of their rights, they may avail themselves of the remedies provided by the applicable regulations.

5. SANCTIONS FOR NON-COMPLIANCE

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.

6. UNITS RESPONSIBLE FOR THE DOCUMENT

Responsible for preparing the document:

- Legal, Corporate Affairs and Compliance

Responsible for document authorisation:

- General Manager

7. REFERENCES

- Orygen Code of Ethics
- Anticorruption Policy - Zero Tolerance Plan against Corruption
- Human Rights Policy
- Criminal Risk Prevention Model
- Law No. 29733 - Personal Data Protection Law
- Regulation of the Personal Data Protection Law, approved by Supreme Decree No. 016- 2024-JUS.
- Information Security Directive approved by Directorial Resolution No. 019-2013 - JUS/DGPDP
- Directive No. 01-2020-JUS/DGTAIPD, Processing of Personal Data by Video Surveillance Systems, approved by Directorial Resolution No. 02-2020-JUS/DGTAIPD
- Personal Data Bank Registration Guide
- Practical Guide for Compliance with the "Duty to Inform"

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8. POSITION OF THE ORGANISATIONAL PROCESS IN THE PROCESS TAXONOMY

Process Area: Legal, Corporate Affairs and Compliance Macro

Process: Compliance

9. DEFINITIONS AND ACRONYMS

Keywords	Description
Consent:	The legal act granted in a free, prior, express, unequivocal and informed manner by the Data Subject that allows the processing of their Personal Data.
Personal Data:	Any information about an individual that identifies them or make them identifiable through means that can be reasonably used.
Sensitive Data:	They are Personal Data consisting of biometric data that can, by themselves, identify the data subject; data relating to racial or ethnic origin; economic income; political, religious, philosophical, or moral opinions or beliefs; trade union membership; and information relating to health or sexual life.
Rights of the Data Subject:	They are those rights that can only be exercised by the Data Subject. They are mainly the following: (i) access; (ii) information; (iii) rectification; (iv) cancellation; (v) opposition; (vi) updating; (vii) inclusion; and, (viii) portability.
Data Processor:	It is the entity that carries out the processing of Personal Data, which may be the Owner of the Personal Data Database themselves or another person on behalf of the Owner of the Personal Data Database by virtue of a legal relationship that binds them to the Owner and defines the scope of their actions.
Personal Data Security Incident:	Any breach of security resulting in the destruction, loss, unlawful alteration of Personal Data or unauthorised communication or exposure of such data.
Personal Data Protection Regulations:	It is Law No. 29733 - Personal Data Protection Law; its Regulation, approved by Supreme Decree 016-2024- JUS; and its complementary and amending rules.
Personal Data Officer	Orygen worker in the Legal, Corporate Affairs and Compliance department, appointed in view of their professional qualities and, in particular, their knowledge and practice in the field of Personal Data Protection, for the

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	exercise of the functions delimited by the Personal Data Protection Regulations.
Personal Data Receiver:	Any individual or legal entity under private law, including branches, subsidiaries, affiliates or similar; or public entities, which receives the Personal Data in case of Transfer.
Third:	Any individual, legal entity under private law or public entity, other than the Data Subject, the Owner of the Personal Data Database, and the Data Processor, including those who process Personal Data under the direct authority of any of the aforementioned.
Data Subject:	The individual to whom the Personal Data corresponds.
Owner of the Personal Data Database:	It is Orygen, who determines the purpose and content of the Personal Data Databases, their processing and the corresponding security measures.
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, including managers; or, (ii) performs training activities under any type of training modalities regulated by the labour legislation in force.
Transfer:	It is any transfer, provision, or disclosure of Personal Data, whether national or international, to a private law legal entity, a public entity, or a natural person other than the Data Subject.
Personal Data Processing:	It is any operation or technical procedure, automated or not, that allows the collection, recording, organisation, storage, preservation, processing, modification, extraction, consultation, use, blocking, deletion, communication by transfer or dissemination or any other form of processing that facilitates the access, correlation or interconnection of Personal Data.