

Policy No. 84

Version No. 2 date 09/01/2025

Subject: Workplace Harassment**Application Areas**Staff Function: *People and Culture*

Service Function: -

Business Line: -

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MANAGER OF PEOPLE AND CULTURE
Milagros AGUILAR

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1. OBJECTIVE OF THE DOCUMENT AND SCOPE OF APPLICATION

The objective of this policy is to define the key principles required to disseminate a culture that rejects and does not tolerate any form of harassment in the workplace, as well as to provide tools to deal with these unfortunate situations.

This policy applies to all workers of ORYGEN PERU S.A.A. hereinafter the Company and third parties working with employees of the Company, in all instances where it operates its business (workplace and any place where employees conduct business on behalf of the Company) such as business trips, lunches, dinners, field visits, training, online and telephone communication within working hours and work-related social activities. Activities inside and outside the company's facilities must always be consistent with the Company's values and its commitment to diversity and inclusion.

This procedure 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.

2. DOCUMENT VERSION MANAGEMENT

Version	Date	Description of the main changes
1	07/16/2024	This PL No. 84 replaces PL No. 431 Workplace Harassment Policy.

3. PROCESS DESCRIPTION

3.1 General Principles

According to Convention 190 on Violence and Harassment declared by the ILO and ratified by Peru:

- Everyone has the right to a world of work free from violence and harassment, including gender-based violence and harassment.
- It is recognised that violence and harassment in the world of work can constitute a violation or abuse of human rights, and violence and harassment are a threat to equal opportunity, and are unacceptable and incompatible with decent work.
- The importance of a work culture based on mutual respect and human dignity to prevent violence and harassment is recognised.

The Company:

- It promotes the principles of diversity, inclusion and equal opportunity and fosters a work environment in which people are treated with dignity, decency and respect, with the aim of improving access to and participation in work activities, and achieving higher levels of well-being and quality of life at work and obtaining better results.
- It protects the physical and psychological integrity, honour and individuality of its workers and opposes any attitude or type of behaviour that results in discrimination or prejudice to the person, their convictions or preferences.

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- It does not tolerate any conduct that creates an unpleasant and offensive work environment for any person. In this regard, all Company workers are requested to ensure that their own behaviour does not cause offense or cause misunderstandings with others.

This policy is not limited to harassment that occurs within the workplace facilities. The Policy also prohibits harassment outside the workplace, including but not limited to harassment in business-related settings, such as business trips, lunches, dinners, field visits, and work-related social activities. Activities inside and outside the company's facilities must always be consistent with the Company's values and its commitment to diversity and inclusion.

Any worker who, in good faith, reports a possible violation of this Policy will be protected from any form of retaliation.

Workers who have committed inappropriate conduct may be subject to disciplinary action, including termination of their employment contract.

3.2 Definition and Types of Harassment

Harassment can be defined as any unwanted behaviour or conduct that creates a degrading, hostile, humiliating, intimidating, offensive or unsafe work environment. Includes physical, verbal or visual acts or behaviours.

Examples of conduct or behaviour that may constitute harassment include, but are not limited to:

- Verbal conduct such as the use of stereotypes, profanity, epithets, insults, jokes, mocking another person's accent, customs and/or culture, abusive language, derogatory remarks, unwelcome jokes, teasing and other similar offensive, demeaning, hostile or inappropriate language.
- Visual conduct such as creating, distributing or displaying offensive objects, images, posters, photos, cartoons, screen savers, websites, magazines, T-shirts, drawings, writings (including inappropriate messages in any other Company environment, such as toilets or lifts or use of Company assets to convey such images), and facial expressions or gestures.
- Physical conduct, such as unwanted touching (or threat of touching), assault, restraint, blocking movement or other physical interference.
- Any other conduct that does not appear to constitute explicit harassment such as allusive proposals or demeaning behaviour (e.g., repetitive meetings, messages, chats and/or phone calls apparently for work purposes, but with the ultimate purpose of limiting rights and freedoms, causing offense or giving rise to misunderstandings towards other workers). This also includes insidious forms of harassment such as annoying or intimidating invasions of someone's personal space or work area, standing too close to co-workers or physically approaching them in a way that corners them or makes them feel threatened, posting offensive images in the work space, promoting or requiring the wearing of sexually suggestive clothing, or even having conversations with offensive elements that other workers may overhear.

The use of Company tools, including e-mail, voice mail, chat or electronic messaging, online workspaces, information repositories, and Internet access to visit websites, transmit comments, jokes or photographs, store material (including in undeleted e-mails), or to deliver messages that are harassing in nature, also constitutes a violation of this Policy and will be subject to disciplinary proceedings as appropriate.

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3.2.1 Workplace Harassment

Workplace harassment includes, among other things, any unwanted behaviour or conduct, whether physical, verbal or psychological, that has a negative effect on working conditions or that is intended to humiliate, denigrate, offend, intimidate an individual or a group of people and that may seriously affect their person, health, career or dignity.

Workplace harassment may also refer to discrimination related to gender identity, age, disability, national origin, ethnicity, colour, political opinions, religious views, language, marital status, sexual orientation and personal characteristics such as personal beliefs, union membership and activity and any other form of social discrimination.

Workplace harassment may include, but is not limited to:

- Persistent, unjustified and unnecessary negative attacks related to the personal or professional sphere with the intention of offending the employee.
- Manipulation of an employee's personal or professional reputation through rumours, gossip or ridicule.
- Offensive comments or behaviour related to the above-mentioned discrimination.
- Continuous exclusion or isolation from professional activities.
- Misuse of a position of influence, power or authority against another person.

It is important to differentiate the possible conducts of harassment at work, taking as a reference the above definition, from the normal situations of coexistence that may occur in the development of work, but do not imply a harassing conduct.

By way of example but not limited to, they do not constitute conduct or situations of Workplace Harassment, provided that the principles defined in the Code of Ethics are not violated:

- Difference of opinion or concepts among peer workers, managers, subordinates, etc.
- Assignment and scheduling of work in accordance with the employment contract and the law.
- Specific differences of opinion in feedback or evaluation processes, and communications about inappropriate behaviour.
- Setting reasonable objectives, standards and deadlines.
- Decisions on the allocation of benefits and development programs that have followed a process in accordance with current regulations.
- Acts intended to exercise the disciplinary authority that legally corresponds to the company over its employees.
- Changes of positions due to organisational restructuring or other reasons in accordance with the law.
- The requirement to comply with the obligations or duties set forth in the Internal Labour Regulations and in the employment contracts.
- Any other reasonable and lawful exercise of a management function.

3.2.2 Sexual harassment or Stalking

Sexual harassment is a form of violence manifested through all abusive conduct with a sexual or sexist connotation, unwanted or rejected by the person against whom it is directed, which undermines their dignity or moral, psychological or physical integrity, endangering their employment or creating a hostile, intimidating and humiliating work environment for the worker. It may occur outside the working hours and outside the workplace.

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3.3 Harassment Reporting and Investigation Procedure**3.3.1 Workplace Harassment**

Anyone who feels that they are being or have been a victim of workplace harassment or who has observed or has knowledge of possible harassing conduct directed towards another person covered by this Policy should report the situation to the Ethics Channel: [Ethics Channel - Orygen.](#)

Investigations into reports will be conducted in a timely, fair and impartial manner, in accordance with the values and principles included in the Code of Ethics and the Whistleblowing Policy.

The Prevention Officer is responsible for investigating the complaint and sending the final report to P&C within a maximum period of 60 days. P&C is responsible for the disciplinary procedure and for keeping the Prevention Officer informed about this process.

Any employee who reports a possible violation of this policy will be protected against any form of retaliation.

However, there will be zero tolerance for reports made in “bad faith” as well as for false accusations.

3.3.2 Sexual Harassment

The sexual harassment prevention measures, the obligations of workers and company and the procedure for investigation and sanction of sexual harassment are applied in accordance with PL No. 9 Regulation Prevention and Sanction of Sexual Harassment, in accordance with Law No. 29430 and Legislative Decree No. 1410 amending Law No. 27942, Law on Prevention and Sanction of Sexual Harassment, and the regulation approved by Supreme Decree No. 014-2019-MIMP.

3.4 Disciplinary Measures

Without prejudice to the provisions of PO No. 10 Management of Disciplinary Measures, the application of measures for workplace harassment shall take into account, among other factors:

- The severity and frequency of the behaviour.
- The existence of previous incidents or warnings.

Considering the seriousness of the facts found in the investigation, the Company may take some protective measures in addition to the sanctions, such as the separation of physical spaces, redistribution of working hours, relocation of the person(s) involved, among others.

Appropriate disciplinary action and sanctions will be taken against any person who retaliates against, victimises or harasses another employee, including a verbal or written warning, up to and including termination of employment in accordance with the Company's disciplinary policy.

No one shall be subject to any form of retaliation, intimidation or retaliation for reporting what they in good faith believe to be an incident of harassment. If the whistleblower or witness believes that they shall be subjected to retaliatory behaviour because of the complaint in which they are involved, they may immediately report the incident and contact the P&C department.

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3.5 Confidentiality

The company is committed to maintaining the confidentiality of all reports to ensure fairness to all parties involved and to protect their privacy in accordance with applicable data protection regulations.

Workers, supervisors, managers and others involved in or aware of a complaint or investigation are expected to protect the confidentiality, sensitivity and privacy of all parties involved to the maximum extent possible. Information may only be disclosed to investigate and support prompt action during the reporting process or to stop harassment or to comply with applicable legal obligations.

3.6 Preventive Actions

The company is committed to promoting respect, dignity and consideration among all its workers, suppliers and other stakeholders involved in its operations.

In order to prevent and avoid possible situations of harassment at work, the Company develops and maintains different activities to strengthen the knowledge and culture of prevention of these conduct.

3.6.1 Training Activities

Internal trainings on work ethics, appropriate behaviours and respect for diversity in the workplace help employees understand and change behaviours that could cause discrimination and harassment. P&C provides training on these guidelines in accordance with local legislation and practice.

3.6.2 Awareness Initiatives

The Company expresses its commitment to the prevention and prohibition of harassment through various dissemination and communication activities that seek to create a prominent awareness and foster a culture open to reporting any inappropriate behaviour.

4. UNITS RESPONSIBLE FOR THE DOCUMENT

Responsible for preparing the document:

- People and Culture

Responsible for authorising the document:

- People and Culture

5. REFERENCES

- PO No. 1 Organisational Document Management.
- PL No. 81 Diversity and Inclusion.
- PL No. 9 Regulation Prevention and Sanction of Sexual Harassment.
- PO No. 10 Management of Disciplinary Measures.

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- Internal Labour Regulations.
- Convention 190 on Violence and Harassment - International Labour Organization.

6. POSITION OF THE ORGANISATIONAL PROCESS IN THE PROCESS TAXONOMY

Process Area: People and Culture

7. DEFINITIONS AND ACRONYMS

Acronyms and keywords	Description
P&C	People and Culture
ILO	International Labour Organisation