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EXTERNAL AFFAIRS MANAGER

ORLANDO MERCADO

1. OBJECTIVES OF THE DOCUMENT AND SCOPE OF APPLICATION

The purpose of this document is to acknowledge our responsibility to act in an ethical and sustainable manner, ensuring that our activities promote the well-being of the persons and communities where we operate.

This policy applies to all company employees, including its directors, managers, workers in general and, where appropriate, as well as, where applicable, any third party contractually or commercially related to the company.

Likewise, the company's suppliers are required to standardize their procedures to this policy in accordance with the nature of their contract.

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.

2. DOCUMENT VERSION MANAGEMENT

Version	Data	Description of the main changes
1	12/31/2024	First version of the document
2	05/19/2025	Amendment of the texts of sections 3.2.1 Rejection of Forced or Compulsory Labour and Child Labour; and 3.2.3 Freedom of Association and Collective Bargaining

3. PROCESS DESCRIPTION

3.1 ORYGEN's Commitment to Respect for Human Rights

Sustainability and integrity are two key values of ORYGEN's culture. Therefore, we firmly believe that respect for and promotion of human rights are essential to our business success and to our positive contribution to society.

This human rights policy establishes ORYGEN's guiding principles and commitments in this regard, with the legal framework established in chapter 5 References of this document.

3.2 Guiding Principles

The principles included in this section take into account their relevance to our business activities and relationships. We are committed to respecting these principles, taking into account local cultural, social and economic diversity, requiring each of our stakeholders to behave in accordance with these principles.

3.2.1 Rejection of Forced or Compulsory Labour and Child Labour

We reject the use of any form of forced or compulsory labour, as well as all forms of slavery and human trafficking—as defined in ILO Convention No. 29—and we do not confiscate money or identity documents in order to retain workers against their will.

We categorically reject the use of child labour, as defined by applicable national legislation and the standards of ILO Convention No. 138. In those exceptional cases where legislation permits the employment of persons under the age of 18, we explicitly commit to assessing and mitigating potential risks to their health, safety, working conditions, and working hours, establishing strict controls and expressly prohibiting their participation in hazardous activities.

3.2.2 Respect for Diversity and Non-Discrimination

We promote the principles of diversity, inclusion, equal treatment, and equal opportunities, and we are

committed to ensuring the right to working conditions that respect the dignity of every individual, creating a work environment where persons are treated fairly and valued for their uniqueness.

We reject all forms of discrimination in relation to gender, age, disability, nationality, sexual orientation, ethnicity, religion, political opinions and any other form of individual diversity or detrimental to the individual, their beliefs or preferences, according to our Diversity and Inclusion Policy No. 81. Likewise, through our Vacancy Coverage Policy No. 17, equal opportunities are ensured either when the employment relationship is established or in any area of its development.

3.2.3 Freedom of Association and Collective Bargaining

We fully protect and guarantee the right of our employees, suppliers and contractors to freedom of association and collective bargaining, explicitly committing ourselves to the international standards established in ILO Conventions 87 and 98. To this end, we implement effective mechanisms to oversee that these rights are respected and effectively enforced throughout our value chain.

3.2.4 Well-being, Health, and Safety

We are committed to ensuring that the best occupational health and safety conditions are respected in the workplace. We strive to develop and foster a strong culture of health, safety, and well-being throughout our company to ensure a safe work environment, promoting risk awareness and encouraging responsible behaviour among our employees, through our Well-being and Health Policy No. 16, and by establishing Internal Rules and procedures, communication and awareness campaigns, training and coaching sessions, and other activities.

We promote a safe environment in order to maintain a positive and respectful work environment. We reject harassment in all its forms: physical, verbal, visual, psychological, discriminatory or sexual, that creates a derogatory, hostile, humiliating, intimidating, offensive or unsafe work environment, according to our Workplace Harassment Policy No. 84.

We also involve our contractors and suppliers in our development and awareness programs: everyone must feel responsible for their own health and safety, as well as for that of others.

3.2.5 Fair and Favourable Working Conditions

Our Wage Policy No. 5 takes into account the principle of fair pay for work and respects the principle of equal pay, based on objective job evaluation. The minimum remuneration received by ORYGEN Employees shall not be less than the minimum set forth in the collective bargaining agreements and labour law in force. Wages and employment benefits shall comply, at a minimum, with the national legal standards of our country.

Likewise, ORYGEN recognizes the importance of training and professional guidance for the development of persons and their skills, so it has training and coaching programs aimed at providing its employees with the knowledge and skills to promote their professional development and the best performance of their duties.

3.2.6 Respect for Community Rights

We care about maintaining responsible and trusted relationships with communities close to our operations. To this end, we implement dialogue mechanisms and promote investments that seek economic, social and environmental development in a sustainable manner, respecting the cultural diversity and traditions of each community.

We are also committed to the United Nations Declaration on the Rights of Indigenous Peoples.

3.2.7 Respect for the Environment

Our corporate strategy aims to continue to lead the energy transition and strengthen the resilience of our assets to the risks of climate change. To this end, we ensure the protection of the environment and natural resources, respect for biodiversity, the fight against climate change and the contribution to sustainable economic development as cornerstones of our activities. This is regulated in our Environmental Policy No. PE002.

3.2.8 Zero Tolerance for Corruption and Bribery, and Free Competition

We reject corruption in all its direct and indirect forms and recognize the importance of ethical values and justice, well-being and development of societies. Our Integrated Management System Policy regulates and reiterates our position of zero tolerance to corrupt practices within the company's operational environment, as well as our Protocol for Interaction with Public Officials and Authorities, and Policy No. 88 on Gifts and Hospitality, which regulate and prohibit any practices related to undue payments and bribery. Furthermore, our Procedure No. 87 on Donation Management provides clear and transparent guidelines for handling donations to third parties.

3.2.9 Communication and Transparency

We promote transparency and communication with all our stakeholders. For this purpose, we have several communication channels to report on company activities and meet the requirements of each stakeholder.

We respect the confidentiality and right to privacy of our stakeholders and are committed to the proper use of data and information provided to us by persons who work with us, clients and other interested parties.

3.3 Statement of Commitment and Dissemination

In order to implement the commitments established in this policy and in accordance with the content of the "United Nations Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework", this document represents the public commitment to Human Rights that ORYGEN has made to its stakeholders.

The Human Rights Policy will be disseminated to all persons who interact with the company, through relevant mechanisms. Likewise, internal communication and dissemination actions will be carried out to ensure that all company employees adequately understand the content of this internal policy.

3.4 Complaint Mechanism and Whistleblowing Channels

Stakeholders, whether internal or external, may use specific whistleblowing channels:

- Through the ethical channel on the website www.orygen.com
- By letter addressed to: Jirón Paseo del Bosque 500, district of San Borja, Lima Peru

If a report reveals a breach of the principles contained in this Policy, the same procedure established in the Code of Ethics shall be activated.

The handling of complaints shall be in such a way as to guarantee complainants against any kind of reprisal, ensuring the confidentiality of the complainant's identity, without prejudice to legal obligations.

The body in charge of dealing with complaints is Compliance, a department that analyses the complaint, listening, if necessary, to the author and the person responsible for the alleged breach, ensuring equal treatment at the company level, in compliance with company policies and local legislation.

3.5 Review and Continuous Improvement

Based on the proposals of the Sustainability department, this Policy will be subject to periodic review, taking into consideration its adequacy and effectiveness of application.

4. UNITS RESPONSIBLE FOR THE DOCUMENT

Responsible for preparing the document:

- Sustainability

Responsible for authorizing the document:

- External Affairs
- People & Culture

5. REFERENCES

This Policy is based on the principles of the following treaties and international standards:

- The International Bill of Human Rights of the United Nations (UN)
- Universal Declaration of Human Rights
- International Covenant on Civil and Political Rights
- International Convention on Economic, Social and Cultural Rights
- The International Labour Organization (ILO) fundamental conventions Nos. 29, 87, 98, 100, 105, 111, 138, 182 and the Declaration on Fundamental Principles and Rights at Work
- The UN Convention on the Rights of the Child
- ILO Conventions Nos. 107 and 169 on the Rights of Indigenous and Tribal Peoples

The following internal documents relate to the principles listed in this Policy and support its implementation:

- Code of Ethics
- Integrated Management System Policy
- Policy No. 81 on Diversity and Inclusion
- Policy No. 84 on Workplace Harassment
- Environmental Policy No. PE002
- Policy No. 17 on Vacancy Coverage
- Policy No. 16 on Well-being and Health
- Policy No. 5 on Wages
- Procedure No. 87 on Donation Management

6. POSITION OF THE ORGANIZATIONAL PROCESS IN THE PROCESS TAXONOMY

Area Process: Sustainability

Macroprocess: Implementation of Sustainability Projects and Initiatives

7. DEFINITIONS

Definition	Description
Human Rights	These rights are inherent to all human beings, without distinction of any kind, such as race, sex, nationality, ethnic origin, language, religion or any other condition. Human rights include the right to life and liberty; freedom from slavery and torture; freedom of opinion and expression; education and work, among many others. These rights apply to all persons, without any discrimination.
Stakeholders	Refers to any party with a direct or indirect interest in the company's activities, such as clients, employees of any type and hierarchical level, suppliers, contractors, business partners, other companies and trade associations, the financial community, civil society, local communities and indigenous and tribal peoples, national and international institutions, the media, and the organizations and institutions that represent them.
Forced or Compulsory Labour	Any work or service demanded from a person under the threat of penalty, for which the person has not offered themselves voluntarily. (See Article 2.1, ILO Convention No. 29)
Business Relationships	Relationships with business partners, companies in the value chain, as well as any other state or non-state entity directly related to the company's activities, products or services. (Principle 13, "Guiding Principles on Business and Human Rights: Implementing the UN "Protect, Respect and Remedy" Framework")
Discrimination	The term includes both direct and indirect, respectively: a. Any distinction, exclusion, or preference based on race, colour, sex, sexual orientation, religion, political opinion, national extraction, or social origin that has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation; b. Any other distinction, exclusion, or preference that has the effect of nullifying or impairing equality of opportunity or treatment in employment or occupation. (See Article 1.1, ILO Convention No. 111)

Indigenous and Tribal Peoples	These terms respectively refer to: a) Peoples of independent countries who are considered indigenous because they are descendants of the peoples who lived in the country, or in a geographical region to which the country belongs, at the time of conquest, colonization, or the establishment of the present borders of the State, and who, whatever their legal status, retain some or all of their social, economic, cultural, and political institutions; b) Tribal peoples in independent countries who are distinguished from the other components of the national community by their social, cultural and economic conditions, and who live wholly or partly according to their own customs or traditions, or under laws or regulations. (See Article 1.1, ILO Convention No. 169)
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