

## Corporate Policy for the Prevention of Risks of Money Laundering, Financing of Terrorism and Financing and Proliferation of Weapons of Mass Destruction

**Revised:** General Secretary **Approved:** Board of Directors

SGC-MAN-001
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# CORPORATE POLICY FOR THE PREVENTION OF RISKS OF MONEY LAUNDERING, FINANCING OF TERRORISM AND FINANCING AND PROLIFERATION OF WEAPONS OF MASS DESTRUCTION

This policy defines the general guidelines applicable to Mineros S.A. ("Mineros") and its subsidiaries (collectively the "Mineros Group") related to the prevention and control of the risks relating to money laundering, financing of terrorism and financing and proliferation of weapons of mass destruction (the "ML/FT/FPWMD Risks"), in order to reduce the possibility that members of the Mineros Group, in the conduct of their operations, are inadvertently directly or indirectly used as an instrument for the concealment, management, investment or use of any form of money and other assets derived from illegal activities in each of the jurisdictions in which they operate.

The Mineros Group adopts policies, corporate guidelines and risk management methodologies, approved by the Board of Directors of Mineros, in order to implement best practices in their processes that allow adequate management and prevention of ML/FT/FPADM Risks.

Mineros, as parent company of the Mineros Group, has established the general guidelines for the management of ML/FT/FPWMD Risks, and leads and supports compliance with these policies, under the following principles:

#### I. Compliance with laws

The Mineros Group complies with all applicable legal framework in each of the countries in which it operates. All members of the Mineros Group must implement and apply such procedures as it may be required to allow them to comply with the Applicable Laws in their relevant jurisdiction.

### II. Risk management

The Mineros Group has established internal processes to manage the ML/FT/FPWMD Risks, which include the criteria to identify and measure risks and the establishment of adequate controls to mitigate such risks.

## III. Knowledge of counterparties and due diligence

Processes are conducted to understand and learn about all counterparts of the Mineros Group, including obtaining data, documents, checking whether counterparts and legal representatives are included in international restrictive/sanctions lists, as well as reasonable measures to identify the final beneficiaries of each transaction. Procedures are in place to ensure that all data and identification documents of our counterparties are kept up to date.

## IV. Roles and responsibilities

The Board of Directors of Mineros S.A. and the legal representatives of each of the members of the Mineros Group are in charge of establishing and approving policies and guidelines required to address the ML/FT/FPWMD Risks in each of their jurisdictions. The Head of Compliance of Mineros has been appointed to implement and monitor, with the strategic support of the head of each respective area, the policies and guidelines approved by the Board. The legal and/or compliance



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officer of each subsidiary provides the necessary support for communication and coordination in compliance with the guidelines in their jurisdiction.

## V. Identification and reporting of unusual operations

Our internal monitoring processes allow us to detect operations that deviate from the transactional profile and/or that represent unusual activities. When an operation is suspected to be unusual or suspicious, it must be communicated to the Head of Compliance, for purposes of its further review, and consequently make the corresponding reports if applicable.

#### VI. Records

All books, records and documents that constitute documentary support and other information related to ML/FT/FPWMD management are kept, through electronic, magnetic or physical means for a period of 5 years.

## VII. Training

Training and induction programs are provided to all employees of the Mineros Group, at least once a year, to ensure that all employees are aware of their responsibilities and the procedures they must follow related to compliance with ML/FT/FPWMD policies.

## VIII. Cooperation with authorities and compliance with international sanctions

Grupo Minero cooperates at all times with local and international authorities on the fight against ML/FT/FPWMD. It also complies with all sanctions issued by international organizations.

Verification of compliance with the control policies and procedures against the risk of money laundering and terrorist financing provided in this policy is part of the specific role of the Internal Audit and the Statutory Auditor, which are executed through the application of the relevant regulations.

These guidelines are mandatory for all parties acting on behalf of or for the benefit of the Mineros Group. Applicable sanctions at law will be applied in the vent of non-compliance.

Approved at the May 5, 2021 Board meeting.