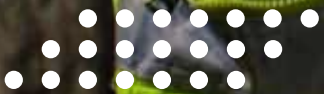




# HOCHSCHILD CODE OF CONDUCT





**I am proud to say that, for more than 100 years, Hochschild has been characterized by the excellence of its people and its commitment to society.**

As members of this group, we have a duty to contribute to maintaining and increasing the confidence of our stakeholders in our professional ability, honesty and integrity; a reputation that has been well earned and sustained over the years, not only by our words, but also by our daily behavior.

Our Code of Conduct reflects the values we have always practiced. In short, it describes the basic principles that every member, or person associated with our Corporation, must demonstrate on an ongoing basis in relation to ethical behavior, our purpose, and cultural attributes.

It is the responsibility of each one of us to lead by example and to always act in the right way in whatever setting we find ourselves. Let us demonstrate that together we can contribute to a better world by passing on our values to future generations of Hochschild employees.

**Eduardo Hochschild**

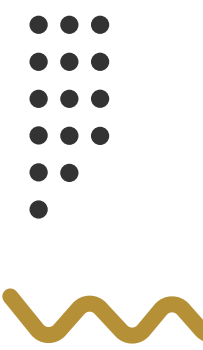
Chairman

## Before we begin:

### As Hochschild members, it is our obligation:

- **To know and understand** the Hochschild Code of Conduct and its principles in their entirety.
- **To be certain about the right way to act.** Although this document addresses a range of circumstances that anyone could face at any time, it is impossible to cover every situation that could arise. Therefore, it is important that, if we have any questions about the scope of the Hochschild Code of Conduct or how we should act in a particular situation, we consult with the Country Compliance Officer and/or the Corporate Compliance Officer in a timely manner.
- **To express our concern or report through the Ethics Line:** [lineaetica.hocplc.com](https://lineaetica.hocplc.com), if we believe that any member of the Corporation, whether a direct employee or not, has acted or is acting in a manner contrary to the guidelines and/or spirit of our Hochschild Code of Conduct.





## The Ethics Line Committee is comprised of:

### Audit Committee Chairman - Independent Director.

- 🏠 17 Cavendish Square,  
London, W1G 0PH
- ☎ +44 (0) 20 3709 3262

### Corporate Deputy Manager of Internal Audit

- 🏠 Calle La Colonia 180. Santiago  
de Surco. Lima, Perú
- ☎ 511-317-2000

### Company Board Secretary

- 🏠 17 Cavendish Square,  
London, W1G 0PH
- ☎ +44 (0) 20 3709 3262

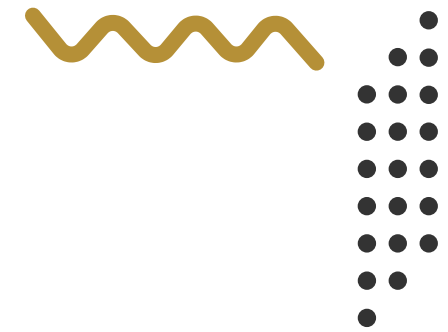
### Corporate Manager of Internal Audit

- 🏠 Calle La Colonia 180. Santiago  
de Surco. Lima, Perú
- ☎ 511-317-2000

### Vice-President of Human Resources

- 🏠 Calle La Colonia 180. Santiago  
de Surco. Lima, Perú
- ☎ 511-317-2000

You can also email them at: [info@hocplc.com](mailto:info@hocplc.com)



## Our purpose

**Responsible** and innovative mining committed to com A BETTER WORLD.

## Our attributes



We inspire  
and promote  
talent



We innovate



We always  
seek  
efficiency



We are  
always  
responsible



## Our principles of conduct

**The Hochschild Code of Conduct sets out the principles that should guide the behavior of everyone who works at Hochschild and its subsidiaries**, wherever we are based. Our behavior, both within and outside the scope of our job responsibilities, is directly related to the image of the Company.

Any breach of the Code of Conduct, or of the spirit of the Code, is considered serious misconduct and may result in disciplinary action up to and including termination of employment of the person(s) involved. Hochschild may be required to report to regulators and authorities any conduct that violates the provisions of this Code of Conduct or the law, in which case the Employee involved may be subject to criminal or civil penalties.





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- 07.** Conduct with **a Sociedade**
- 08.** Compliance with the **Code of Conduct and Ethics Line**





# 01

## Conduct with our Co-workers

Respect is a fundamental part of our conduct. Our differences empower us and help us achieve our goals.



01.

## We respect diversity and treat all people fairly and equitably.

We respect Human Rights and promote equity, diversity and inclusion as part of our Company's purpose. We consider it fundamental for the sustainability of our Corporation to have diverse and inclusive work environments, free of violence and where equal opportunities are promoted for all people who are part of Hochschild. We categorically reject any act of discrimination.

We do not accept any kind of harassment or bullying, whether in the workplace, morally or sexually. We reject any situation that constitutes a pressure, intimidation or threat among employees, suppliers or customers, regardless of the position or hierarchical level from whom it comes.



**Harassment is understood as any behavior, comment, gesture or contact that could:**

- Cause offense or humiliation to an Employee, customer or supplier.
- Affect the honor, good reputation, personal or family privacy, or personal image.
- Be perceived as an abuse of authority.
- Be perceived as any type of discrimination of any nature (e.g. sexual, ethnic, etc.).
- Provide promotional or training opportunities for reasons unrelated to merit, performance or the Employee's own activities.
- Be perceived as an invasion of personal space, with or without sexual connotations.

In addition, it is important to respect the dignity and protect the rights of all individuals so that it is their merits and ability to work, that contribute to their growth and/or professional development at Hochschule. This means not discriminating on the basis of origin, age, race, gender, religion, language, economic status, opinion or physical limitations.

02.

## Equitable compensation

Compensation to Employees is **granted based on the principle of meritocracy** which recognizes the contribution of each one to the achievement of the Corporation's objectives. Compensation is defined according to the relevant reference market **in a fair, equitable and transparent manner, without any discrimination** based on origin, race, sex, language, religion, opinion, economic or any other status.



03.

## Training and development

**We encourage learning in different modalities** such as: internal or external training, temporary assignments and lateral movements, among others, that allow us to achieve the best results in the performance of our duties, professional and personal development.

Likewise, before starting our work, **we have the right and obligation to receive information and training** that allow us to control the risks of the activity we were hired.



04.

## Supervision and leadership

It is an essential part of a **leaders' duty to pay special attention to the motivation, recognition or positive reinforcement and professional development of Employees**; generating opportunities for growth based on merit and job performance. To this end, **leaders are expected to set an example of ethical, professional behavior**; encourage training and learning; value and recognize the performance, achievements and outstanding efforts specifically of their team members.



05.

## Transmission of information

**We must provide truthful, necessary, complete, timely and punctual information** about tasks or activities to the people who need it, to our team and co-workers for the proper performance of their duties.



06.

## Achievement of results

All Hochschild members must **contribute and align their efforts to the achievement of corporate and personal results**, as efficiently as possible and in full compliance with the Hochschild Code of Conduct and the laws of the countries where we operate.



07.

## Internal and external customer-oriented

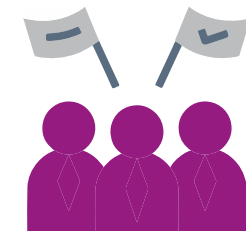
Our conduct must be based on **efficiency, professionalism, service-oriented mentality and cooperation, seeking maximum satisfaction** of our internal and external customers, by providing competitive and quality solutions. Therefore, we must always be friendly, courteous, and honest with a service attitude.



08.

## Freedom of union membership

**We respect the decision of any Employee to join labor unions** and to obtain wage and work improvements through collective bargaining negotiations where respect prevails in harmony with our standards, international regulations and our Corporate Sustainability Policy.





# 02

## Conduct within the Company

Protect and use Hochschild's information and assets responsibly to prevent putting ourselves or our Company at risk.

## 01.

## Conflict of interest

**We avoid any situation in which our personal interests conflict or could conflict with our obligations to Hochschild.**

No Director, Executive, Employee or External Advisor may use his or her authority or position, either directly or indirectly, to make decisions that improperly benefit him or herself or a specific group of people.

Similarly, in the event of any situation where there is, or is perceived to be, an advantageous position vis-à-vis third parties, **we must not abuse that advantageous position to improperly favor Hochschild to the detriment of third parties.**

**None of us, or any family members, should have a business or financial interest with a supplier to Hochschild,** its subsidiaries or any other entity that has business ties to the Company, as this could create a conflict of interest situation.

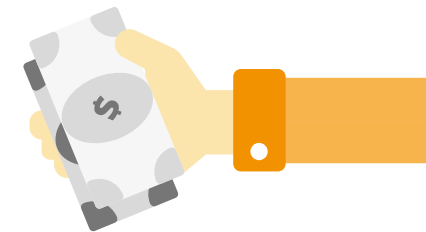
**If we find ourselves in a conflict of interest situation or in a situation that we believe others might interpret as such, we must report it to Human Resources Management in the country** where we work, or to the Vice Presidency of Human Resources and/or Corporate Internal Audit Management and/or the Company Board Secretary immediately; so the situation can be evaluated, a determination made as to whether a conflict of interest exists or whether the situation raised could damage Hochschild's reputation, and appropriate action taken.

## 02.

## Business activities, financial interests or outside employment.

**During working hours, engage only in activities that are appropriate to our duties** and do not use Hochschild equipment or facilities for personal or outside business. In this way, we will be more efficient and achieve the goals we have set for ourselves as a company.

**Before beginning or continuing an outside business activity;** acquiring or maintaining a financial interest with a Hochschild supplier or any other entity that has close ties to the Company; **or engaging in after-hours work, report it** to the Area Manager and by mail to the Vice Presidency of Human Resources and/or Corporate Internal Audit Management, to ensure that these activities will not create a conflict of interest or impair the performance of our duties at Hochschild.





03.

## Misuse of our position or Hochschild's name and/or resources

**We must not give false impressions about the position we hold**, nor use the Corporation's name, facilities<sup>1</sup> or information<sup>2</sup> in order to benefit personally in political, credit, investment, retail, wholesale or other similar activities.



04.

## Entering False Data or Information

**It is not permitted to enter or allow false or misleading information** to be entered into a Hochschild account, record, model, system or document.



05.

## Improper Access to Records

We may access and use records, data, files, computer programs, financial statements and supplier information **only for the purposes intended and approved by the Company**. If we observe or detect that we have access to information that we are not entitled to, in accordance with our responsibilities, or if we know of someone who does and should not, we must immediately notify our immediate supervisor.



<sup>1</sup> Electronic and telecommunication facilities and systems, such as Internet access, voice mail, e-mail, printers, and telephones are made available to you to help us perform our duties. All other use, except for reasonable and occasional use, is not permitted.

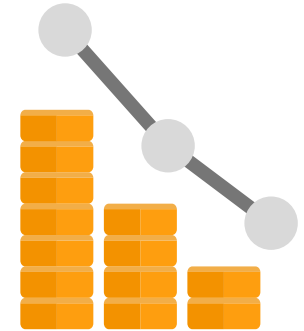
<sup>2</sup> We must not copy Corporation information, including software or videos, for personal purposes unrelated to our work or for any other person, unless we are authorized to do so.

## 06.

## Expense reports

**Expenses** incurred in the performance of our duties (travel, transfers, among others) must be **reasonable, duly supported and submitted in a timely manner to the corresponding area**. All expense reimbursement requests must comply with the procedures established by the Company.

Travel and entertainment expense claims must be fair and relate only to Hochschild's activities. Likewise, reimbursements for transfer expenses must adhere to current procedures.



## 07.

## Accuracy and integrity of records

**The Company's books and records must always be complete and accurate**, in accordance with good business practices, Company regulations and applicable law; and we must ensure the accuracy and completeness of records and reports under our responsibility. **We follow the instructions in the Company's procedures and manuals** to ensure that transactions are properly authorized, timely recorded in the appropriate records and supported by the corresponding documents.

**We must not, under any circumstances, overlook an internal control procedure**, even if we consider it unimportant or believe it would save us time.



## 08.

## Information Confidentiality

**We must protect the confidentiality and security of information** Hochschild obtains, produces, uses or retains, as well as information we discard or destroy as unnecessary. In most cases, the confidentiality of information to which we have access in the performance of our duties is also a legal requirement, including the personal data of Employees and any third parties who have a relationship with the Company.

**We must take special care regarding the confidentiality of Hochschild's financial statements**, operating results, Hochschild projects and any other sensitive, non-public information that could give any person an advantage in acquiring or selling shares in Hochschild or any other company with an interest in a Hochschild project. Trading Hochschild stock while in possession of sensitive, non-public information is a criminal offense and could result in a fine and/or civil and/or criminal liability.

**Comply with the confidentiality rules and procedures adopted by the Corporation.** If we receive requests for information of a confidential nature, before responding, always ensure that we follow the procedures established for this purpose or request authorization from our immediate supervisor.



Protect the privacy of other Employees, including their personal information, and the confidentiality of Hochschild's business even after we leave the Company.

**In order to ensure proper confidentiality of information:**



Avoid leaving documents and any storage media (CD, USB, external memory sticks, etc.) with confidential information, exposed so that they can be reviewed by unauthorized persons, lost or stolen by third parties.



We do not transmit confidential information to persons outside the Company, including family members, associates or other Employees who do not need the information for their work.



Use only secure means of communication defined by the Company (corporate platforms and tools defined by our IT area) to transmit confidential information (e.g. we should not use WhatsApp web or tools such as WeTransfer to transmit business information) and always ensure the identity of the person sending the message to the interlocutor.

## 09.

## Security of assets in our custody and in the hands of third parties

Keep the Company's systems secure and protect the Company's property and assets, which are in our custody and control. Be alert to the possibility of damage, loss, alteration, misuse or theft of Hochschild assets.

The Company's assets include:



Servers, computers, tablets, cell phones, modems, USB's and any computer equipment provided by the Company for the performance of our work, as well as the information residing therein.



Information in our network and in the data storage centers that we have both, in our own data centers and in those of third parties, either on premises or in the cloud, as well as the information that resides in third-party contracted systems, such as shared or office automation platforms (e.g., information that we have in our emails or in the different platforms of Google Workspace or Microsoft Office 365).

WWW

Information systems, websites, ERP, software programs, databases and other technologies developed or acquired by our Company.



Intellectual property designed and/or developed by our employees or by third parties at our request. For example: software architecture design, business blue prints (ERP), software programs, source code, etc.

**Note:** If we have developed a creative work, computer program, industrial design, or patentable invention within the scope of our duties at the Corporation or used the Corporation's facilities; such work, design, or invention belongs to Hochschild, unless an express exception is provided for.



If we authorize third parties to hold Hochschild assets in their custody, we must be responsible for knowing and ensuring that they have strict security and care procedures in place for the satisfactory return of the assets.

10.

## Embezzlement and theft of assets

It is prohibited to misappropriate funds or assets and/or attempt to obtain an improper advantage to the detriment of Hochschild or to assist others in doing so. This activity is considered very serious within the Company and will result in immediate dismissal, without prejudice to being subject to appropriate legal action (civil and criminal).



11.

## Acquisition of Hochschild assets

We may purchase Hochschild assets, outright through a family member, such as: automobiles, office equipment or computers, provided that the acquisition is made:

- At a public auction.
- That the price paid for the asset is reasonable and that the competent area has approved the transaction.
- The acquisition is made within the framework of a program approved by the Company.

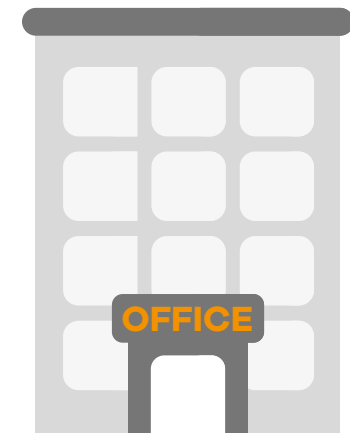


## 12.

## Use of Corporation's assets outside the Corporation

If we need to take **equipment, materials, files and any other information with us away from Hochschild's premises** to perform our duties (for travel, meetings or remote work), **we are responsible for their safekeeping and their return to the appropriate location** once their use is complete.

If we regularly work at home or away from the Corporation's premises and are entrusted with property in our custody, **we must be responsible for its safekeeping.**





## 13.

## Protection of information systems

**We protect information, programs and technology systems from theft or misuse,** as well as from loss or alteration, intentional or otherwise. We are responsible for protecting any information entrusted to us or over which we have custody, even when we are disposing of waste or damaged materials.

**We must at all times comply with information security procedures** and information protection requirements established by the Company.



The rules we must follow include the following:

- Use only **authorized computer programs and software**.
- Comply with **good practices for the use of information assets**.
- **Protect all means of access identification**, such as passwords, access codes, identification cards, and virtual or physical key combinations in our custody. **Do not lend, share or duplicate them without authorization**.
- **Never leave written passwords** or write them down in places where they can be easily accessed by personnel inside or outside our Company.
- If we use systems and software from suppliers or third parties, **we comply with the licensing, confidentiality and registration requirements that have been approved by the Corporation**.



Failure to comply with these rules could result in a violation of copyright laws by us or Hochschild and subject us to severe penalties.

Report any findings regarding a deficiency or vulnerability in our access control systems and security systems or procedures related to the protection of information to our immediate management and/or the Information Technology area and/or the Corporation's Vice Presidency of Finance.



# 03

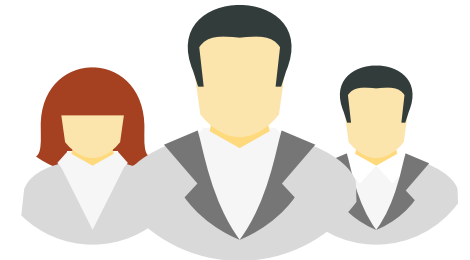
## Conduct with our Suppliers

We will make transparent decisions that allow us to maintain a close and honest relationship with our suppliers.

## 01.

## Relations with suppliers

- **We will use the information** we obtain in dealing with customers or suppliers appropriately.
- We will often **receive confidential information that should not be made public**. It can only be disclosed with the authorization of our management or Human Resources.
- **We must avoid allowing our personal relationships to affect our ability to make** accurate and objective decisions at work.
- **Relationships** with family, friends and associates **should not influence our decisions at work**.
- **Decisions regarding the hiring** of a supplier, customer or worker **must be made on a strictly professional basis**.
- We must **avoid making decisions in situations in which we are personally involved** and refer them to another employee for attention.
- If we wish to introduce Hochschild to **business with a family member, close friend or business associate**, we should be transparent about the relationship at the time of the recommendation and **avoid involvement in the hiring decision**.

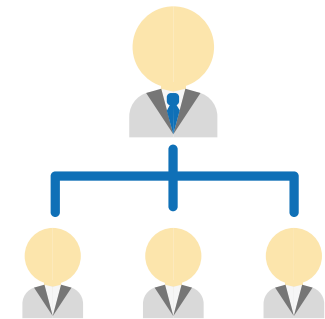


## 02.

## Relations with colleagues

If we have a **family relationship with a Hochschild employee, contractor or supplier, this could create a conflict of interest.** This also applies if we are about to enter into a romantic relationship directly or indirectly with any of them.

If we find ourselves in this situation, we must report the relationship in a timely manner to the country's Human Resources Management or directly to the Vice Presidency of Human Resources, so that the most appropriate action can be taken to avoid this conflict.

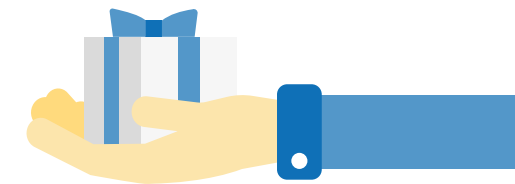


## 03.

## Gifts and invitations

Accepting gifts and invitations from third parties (suppliers, customers or others) may give the impression that our decisions have been unduly influenced or be directly interpreted as a bribe.

Therefore, **we must not use our position to obtain an undue personal benefit.** We should discourage suppliers, customers, relatives or others who have dealings with the Company from suggesting that they offer us any benefit, and we should inform them of our policy in this regard.



We may **accept modest gifts and invitations** only under the following circumstances:



When there is no indication that the person offering the gift or invitation **is trying to impose an obligation on us or unduly influence our decisions.**



When the acceptance **falls within "normal business practice"** in order to be courteous and promote good business relations within established maximum amounts.



When the acceptance is **legal and complies with recognized ethical standards.**



When we or the Company could not be **embarrassed if the circumstances became known to the public.**



When the gift and/or invitation is **within the ranges established** as acceptable.



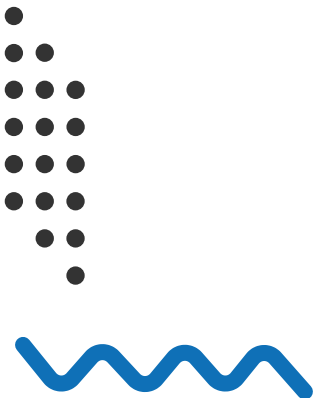
## Acceptable gifts and invitations include:

- Occasional lunches or dinners, invitations to sporting events, plays or occasional small gifts on the occasion of special celebrations such as anniversaries, significant events or holidays, **estimated to cost no more than US\$100.00 (or equivalent)**.
- **Invitations to production plants or offices** of a supplier or customer, subject to the **authorization of the General Manager** of each country.
- **Trips to fairs, conferences and seminars**, as long as they are channeled through the **Vice Presidency of Human Resources**.
- Low-cost advertising or **promotional materials** ("merchandising"), such as pens, calendars, agendas, key rings, among others.
- **Awards in recognition of services rendered** to civic, charitable, educational or religious organizations. Reimbursement of reasonable and substantiated expenses for oral or written presentations on a topic related to the Corporation.
- **Gifts and invitations clearly motivated by obvious family or friendship** and not by business relationships.



It is highly likely that reasonable doubts will arise in the event of accepting a gift. In this case, **if we are not entirely sure whether it is appropriate to accept a gift, we should discuss it with our immediate supervisor or a member of the Ethics Committee,** taking into consideration the above.

We may accept a gift or invitation that exceeds the maximum value indicated, but we must do so on behalf of the Corporation when it would be extremely impolite or inappropriate to refuse it. In these cases, we must communicate this and send the gift and/or proof of the invitation to the Vice Presidency of Human Resources, who will be responsible for distributing it through raffles or assigning it in coordination with the country's General Manager and the Vice Presidency to which we belong.







# 04

## Conduct related with Health and Safety

We comply with and respect the laws in the countries where we operate and develop procedures to make Hochschild a safe environment for everyone. No ounce is worth more than the lives of every person who works with and for Hochschild.

## Zero Tolerance Rules

We will act in a safe manner by respecting our Zero Tolerance Rules, which are based on painful lessons learned in our Company and/or events that occurred to third parties. These serve as a guide and example to avoid exposing ourselves to a similar event. **We have zero tolerance to:**

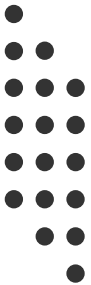
- **Rule 1:** Allowing the entry or entering a restricted area (do not trespass, do not enter, etc.).
- **Rule 2:** Instructing, performing or allowing mining tasks in an unsupported area according to geomechanical indication.
- **Rule 3:** Allowing or performing work on conveyor belts with no guards or rails.
- **Rule 4:** Allowing or performing work on electrical equipment neither de-energized nor locked out.
- **Rule 5:** Failure to evacuate immediately when the monogas equipment alarm sets off (125 ppm).
- **Rule 6:** Coming to work without the appropriate PPE required for the task.



## Refusal of unsafe work

If we observe an unsafe condition that puts the health or life of any person at risk (whether it is ourselves, colleagues, suppliers, customers or visitors), we must take the initiative to say "NO" and immediately notify our management; or, if the work order has been issued by the immediate superior, to a higher authority.

We must also convene the Multidisciplinary Committee composed of area leaders to attend the work observed and together, employees and leaders; we can develop a specific action plan to control the risk and continue or stop operations.





# 05

## Conduct with the Environment

We comply with our environmental policy, commitments and procedures and contribute to a sustainable future by always acting with environmental responsibility and excellence.

## Environment

In order to achieve environmental excellence, we have defined **6 Environmental Commitments**, which are our guides and which we must take into account before every decision we make. They are:

- Act and make decisions considering the impact on **wildlife**.
- Act and make decisions considering the impact on **water quality**.
- Discharge **effluents that comply with standards** and with proper authorization.
- Obtain **authorization from Unit Management** before executing any work and ensure that we have the necessary permits from the competent authorities.
- **Immediately report any environmental incident** to Unit Management and ensure that the contingency plan is implemented in a timely manner.
- We will not manipulate or alter **environmental information**.



In addition, as Hochschild employees, we must follow and comply with the following measures to prevent and mitigate any possible impact on the environment:

- **Minimize our environmental footprint** in all of our activities, inside and outside our operations.
- Keep our **workplace clean and tidy**.
- **Avoid unnecessary water consumption** and immediately inform our immediate supervisor if we find any leaks.
- **Consume only what is strictly necessary**, minimizing the waste that we generate. Segregate waste correctly to ensure reuse or recycling.
- **Do not dispose of waste at unauthorized points**, inside and outside the mining unit. Dispose hazardous waste or materials, including oily materials, in authorized locations, away from water sources.
- **Reduce energy consumption** by always turning off lights and charging our equipment as strictly necessary as part of our commitment to mitigate climate change.
- Keep our activities strictly within the areas of intervention as approved in the applicable permits. **Avoid creating footprints or trails that impact the landscape or compact the soil in other sectors.**

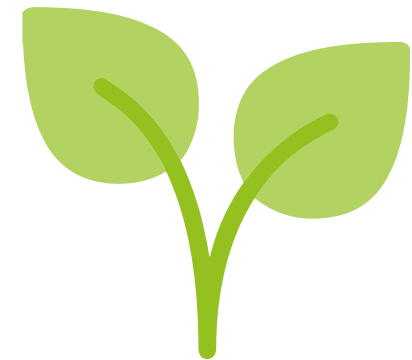


- **Drive vehicles taking into account all precautions to avoid disturbing wildlife**, respecting traffic regulations, speed limits and other company driving and noise emission guidelines.
- Perform **maintenance of vehicles, machinery and equipment** in duly conditioned and authorized areas. **It is forbidden to do so in watercourses or dry streams.**



In turn, to safeguard biodiversity within the scope of our operations and surroundings, we must comply with the following:

- **No introduction of exotic plant species** and no collection or commercialization of plant species considered sensitive.
- **No hunting, fishing or capture of wild animals** or acquiring products derived from these animals: meats, skins, hides, eggs, etc.
- **No introduction of pets**, domestic animals, or non-native species.
- **No disturbing, stalking or chasing wild animals.** If we find any injured or dead animal, we must report it to our immediate boss.
- **No burning** of any flora specimens.







# 06

## Conduct with the Communities

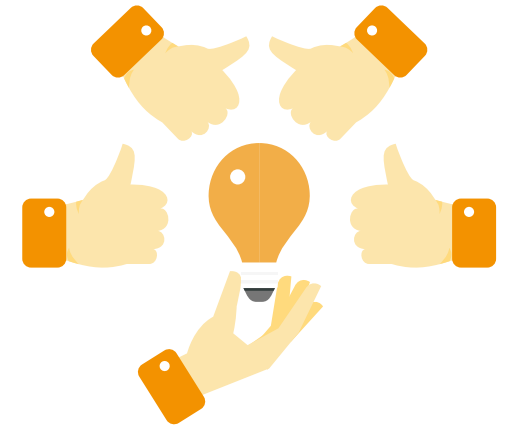
We respect the culture, customs, authorities and all people in the communities in the area of influence of our operations and projects, as well as all people with whom we interact as part of our activities.



We must **foster a climate of peace and rapprochement with the communities** and their local authorities, respecting their identity and autonomy at all times. Likewise, **we must always comply with our commitments and agreements;** only in this way can we build and, above all, sustain a relationship of trust with the stakeholders in our environment.

If, during the course of our work, we interact with people from the communities or their local authorities, **we must maintain open and permanent channels of communication, dialogue and collaboration,** as well as ensure that in any negotiation or work meeting they have sufficient information to ensure a fair and transparent dialogue process.

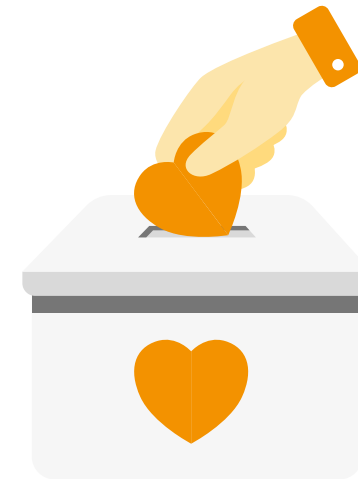
It is important to emphasize that **the relations established with all the people in our neighboring communities** and the bond we generate with them is **strictly professional.** Therefore, we must avoid sentimental or patronage relationships involving a person or groups of the communities. Likewise, in reference to our compliance management, **we must not deliver, directly or indirectly, economic amounts to the people of the communities,** except for persons authorized for such acts such as the Administrators of the Community Relations area and for the purpose of payments generated by the procurement of goods and services.



## Charitable and community activities

Engage in charitable, educational, civic and community activities that reinforce our "We Are Always Responsible" cultural attribute. Ensure that the time and attention devoted to these activities is, as much as possible, **conducted outside of working hours and does not generate any type of conflict.**

It is important that we are alert to any situation that may generate a conflict of interest and, if this is the case, report it so that we can take the necessary measures.





# 07

## Conduct with Society

We must comply with the laws in force in the countries where we operate, explore and develop activities of any nature.

## 01.

## Public statements and contact with the media

As citizens, we have the right to freely express our opinions. However, **only spokespersons authorized by the Vice Presidency of Human Resources and the Vice Presidency of Legal and Corporate Affairs should speak on behalf of our Company.** This provision applies to all types of communication (e.g., statements, speeches, letters and articles) and to all media and communication channels (e.g., press, radio, television, e-mail and/or social media).

If, because of our position in the Company or our recognized professional expertise, we are invited to make a presentation or express an opinion on mining-related issues, **we must make it clear that the opinions we present are personal and do not necessarily represent Hochschild's position,** unless we are presenting a Company-approved point of view.

**We should never mislead the general public or other Employees by making inaccurate or misleading statements or concealing information.** In accordance with Hochschild policy, any communication or statement, verbal or written, must be truthful and authorized by the Company.



**We must respect Hochschild's confidentiality, and before making any business-related information public, we must obtain authorization** from in-country legal counsel or the Vice Presidency of Legal and Corporate Affairs. Be especially careful to avoid answering questions about matters in which litigation is pending or in process unless we have complete information and are authorized to do so by General Management or the CEO.

## 02.

### Bribes and kickbacks

We do not accept bribes, kickbacks or any other illegal payments from suppliers or customers in exchange for favorable treatment or consideration. Such acts are grounds for immediate dismissal and legal action, if appropriate. **If we receive any such offer or know that another person is making such an offer, we are responsible for reporting it through the Ethics Line ([lineaetica.hocplc.com](mailto:lineaetica.hocplc.com)),** or informing the Vice Presidency of Human Resources and/or the Corporate Internal Audit Management so that the corresponding investigation can be carried out.

Never offer bribes or try to obtain benefits in an unethical manner. For further details or clarification, please review our Anti-Corruption and Anti-Bribery Policy.



03.

## Corporate Compliance System

We firmly believe that the sustainability of our business can only be built by doing the right thing, that is, always acting honestly and ethically. **In line with our corporate purpose, we also have a Comprehensive Compliance System, which aims to promote, measure and evaluate our Compliance Culture ("#ComplianceHOC")** to continue improving as an organization and keep intact our good reputation based on integrity, accountability, honesty and transparency. If you have any queries, you can make them through the mail [cumplimiento@hocplc.com](mailto:cumplimiento@hocplc.com) or directly with the Country Compliance Officer and/or the Corporate Compliance Officer.



04.

## Ethical relationships with public officials and political contributions

**We act with integrity with public officials, being transparent in all interactions with them**, whether we are acting on behalf of Hochschild or conducting personal business. **We do not offer, accept or promise any payment or benefit** in order to gain an advantage for the Company or for ourselves; always follow the procedures established by law.



## 05.

## Political activities and contributions

**Hochschild does not make contributions to political parties.**

We only make donations within the framework of our Sustainability Policy and Community Relations Policy, in compliance with the Donations Policy and in compliance with local laws and practices. **We do not offer or accept donations** without the prior approval of the country's General Manager or the Vice Presidency to which we belong.

**The Company's resources and image may not be used to serve political, personal or partisan interests.**

We may make direct cash contributions in our own name, either directly to candidates or to political action committees, but these contributions may not be in any way, directly or indirectly, reimbursed by Hochschild.





## 06.

## Money Laundering and Terrorist Financing Prevention System

As part of our Compliance System, we have a Money Laundering and Terrorist Financing Prevention System, under which we are committed to **not**:



Converting, transferring, acquiring, possessing, using, keeping, storing, administering, guarding, transporting by any means, receiving, concealing or maintaining in possession money or financial instruments, goods, effects or profits whose **origin is illicit**.



Provide, contribute or voluntarily collect by any means, directly or indirectly, inside or outside the national territory, means, funds, financial or economic resources, services of any nature that are of licit or illicit origin, with the purpose of committing terrorist acts or ensuring the existence of a terrorist group.





08

Compliance with the  
**Code of Conduct and  
Ethics Line**

**Hochschild offers protection** to Employees who file a complaint or make inquiries about the scope of this Code of Conduct, **provided they act in good faith.**

**If we believe we have violated the Code of Conduct,** any supplemental guideline or related policy, or observe a serious weakness or deficiency in our Company policies, procedures or controls that could facilitate such violations occurring or going undetected, **we have a responsibility to immediately notify the Vice Presidency of Human Resources and/or Corporate Internal Audit Management.**



## 01.

## Procedure for communicating concerns or inappropriate behaviors

If we reasonably believe that any person related to the Company, whether a direct employee or not, **has acted or is acting illegally or improperly, we can express our concern or report such inappropriate or negligent conduct through the Ethics Line ([lineaetica.hocplc.com](https://lineaetica.hocplc.com))**, a tool that ensures confidentiality and a better investigation process. Please note that:

## 01

**Complaints** made through the Ethics Line **are automatically and simultaneously received by a Committee through a platform designed for this purpose.** If a complaint is made against any of the persons who make up the Committee, they are obliged to abstain from participating in the investigation process.

## 02

Although the Ethics Line is the best channel for making complaints, **if we prefer to make a complaint in person, by e-mail or telephone,** we should contact the Vice Presidency of Human Resources and/or the Corporate Audit Management.

## 02.

## Confidentiality

Hochschild treats **all information confidentially**, protecting the identity of the whistleblower at all times. **It is also possible to report anonymously**, although this limits our investigative work. If the whistleblower prefers not to identify himself, he/she can create an e-mail address that does not reveal his identity, so that we can maintain contact for a better investigation. **The aim is to get to the truth about the facts reported** and Hochschild is committed to keeping the identity of the whistleblower confidential, unless expressly authorized by the whistleblower.

It is mandatory to cooperate with the investigation if we are subpoenaed as part of an investigation into a breach of the Code of Conduct.



## 03.

## Zero tolerance for retaliation

**We will not be punished or subject to detrimental action for reporting a complaint** sharing information, unless we make a report in bad faith or provide false information during the investigation process.

**Any harassment or retaliation** against an Employee who provided information **will be treated as a disciplinary offense, up to and including termination of employment.**



# Letter of commitment and confirmation of receipt of the Code of Conduct

As a Hochschild Associate, I take responsibility for my conduct in accordance with the principles set out in this document, which I have read carefully and fully understand.

I promise to comply with the Hochschild Code of Conduct under all circumstances.

If I violate the Code of Conduct, I hereby submit to internal disciplinary procedures.

Accordingly, I affirm and certify that:

- 1. I have read and understand the Hochschild Code of Conduct.
- 2. I agree to abide by the Hochschild Code of Conduct.

Name: \_\_\_\_\_

Area: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

This Pledge must be signed by each Hochschild Associate.  
Please return this commitment form to Human Resources at your headquarters, which will be kept in your personnel file.