

# Anti-Bribery Policy



**Purpose:** Establish general guidelines to prevent bribery acts in accordance with Peruvian and foreign laws, as well as good practices against corruption.

**Scope:** This policy covers all the activities carried out by Compañía Minera Antamina, Asociación Antamina, Asociación Ancash and Asociación Yanacancha and applies to all Antamina employees and strategic partners.

#### Responsibility:

- The Board of Directors, the General Manager and the Compliance Officer are responsible for overseeing the correct fulfillment of this policy, including its implementation and disclosure.
- The Compliance Officer has complete independence and full authority to enforce compliance with this policy.
- All employees working at Antamina are obliged to thoroughly comply with the guidelines established herein.

#### Guidelines:

- ▶ All bribery acts and forms of corruption are absolutely prohibited by Antamina.
- ▶ No Antamina employee or third party acting on his/her behalf shall induce public or private officers, whether local or foreign, to perform illegal or unethical acts. Moreover, they must help avoid any policy violation.
- ▶ No Antamina employee or third party acting on his/her behalf shall accept, receive, offer, promise, or give anything of value or another advantage to public or private officers in order to obtain, retain or ensure any business, or gain for its own benefit or for the benefit of Antamina.
- ▶ No Antamina employee shall make, help or allow anyone to include false or deceitful information on the company's operating and accounting records in order to conceal undue payments.
- ▶ No Antamina employee shall receive or make gifts or receive or give hospitality or receive or make special payments which appear to be or are aimed at encouraging someone to perform improper or unethical acts.
- ▶ Antamina's employees must use their sound judgment, common sense and good discernment in all decisions they make, in order to prevent any of their actions from being perceived as corrupt or inappropriate.
- ▶ Antamina makes available to its employees and to any third party an Ethical Line managed by an independent third party, to report anonymously and confidentially, based on a reasonable belief, any potential policy violation.
- ▶ The Ethics Committee is responsible for leading investigations on potential policy violations, without prejudice to any other investigation and/or disciplinary procedure simultaneously carried out.
- ▶ The non-compliance of the provisions set forth in this policy and in the applicable legal rules will be considered a serious offense for purposes of the provisions set forth in labor laws. If the non-compliance implies an illegal activity, then Antamina is entitled to report such circumstance to the competent authorities.
- ▶ Employees who retaliate or threaten to retaliate against other employees who report any violation of this policy will be subject to disciplinary action.
- ▶ Antamina undertakes to continuously improve its Corporate Compliance Program in order to comply with all local and international standards that it fulfills in the course of its operations.
- ▶ Antamina undertakes to promote a culture that encourages ethical conduct and prevents bribery among its employees and strategic partners.

VÍCTOR GOBITZ COLCHADO  
President and CEO

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