

## **Message from the President – General Manager (CEO)**

Antamina has an excellent reputation and plays a leadership role both nationally and globally. Its current position and the level of recognition it has earned are the result of our permanent and active commitment to our corporate values: Integrity, Responsibility, Safety, Respect & Recognition, Continuous Learning, and Excellent Performance & Innovation.

These are the guiding principles of Antamina's Code of Conduct. All members of Antamina are primarily responsible for respecting and complying with the provisions of this Code with the aim of working with integrity and correctness, always maintaining the highest standards of behavior and a sound reputation.

I invite you to become acquainted with, disclose, and abide by our values and the provisions set forth in this Code of Conduct.

We are Antamina

We comply!

## **CODE OF CONDUCT**

### **Purpose of the Code of Conduct:**

Every Antamina employee plays an important role in the organization and represents the company before its shareholders, customers, strategic partners, other companies, government entities, non-government organizations, communities, and society in general. In this sense, Antamina aspires to have each and every employee maintain the highest standards of behavior while performing their job duties and have their actions enhance the good name of the company by honestly, thoroughly, and loyally complying with their obligations. Such standards include the duty of probity, diligence, loyalty, good faith, and honesty owed by all employees to the company.

The Code of Conduct of Antamina sets the standards of behavior that the company wants each and every employee to follow, explaining how we should work and relate with our co-workers, suppliers, customers, community members, and other related stakeholders.

### **Scope of the Code of Conduct:**

The Code of Conduct is applicable to all employees (permanent or temporary), interns, officers, directors, members of the committees appointed by the Board of Directors, and strategic partners. The directors and officers of Antamina are obliged to comply with some additional duties and obligations established in the law and the company's policies.

Compliance with the provisions of the Code of Conduct is mandatory and said provisions must be fulfilled while carrying out the company's operations. Moreover, employees must be aware of the fact that even when they act in a personal capacity and outside of the operations or office, their actions could damage the company, so they must avoid behaviors which may be contrary to the law and the provisions of this code.

### CERTIFICACION

CERTIFICO QUE EL DOCUMENTO DEL REVERSO ES LA VERSION VIGENTE AL MES DE AGOSTO DEL DOS MIL VEINTITRES DEL DOCUMENTO DENOMINADO "CODE OF CONDUCT" DE "COMPAÑIA MINERA ANTAMINA S.A." Y QUE A LA FECHA SE ENCUENTRA ALOJADO EN LA PAGINA WEB [WWW.ANTAMINA.COM](http://WWW.ANTAMINA.COM) CON EL SIGUIENTE LINK: <https://www.antamina.com/socios-estrategicos/apendice-de-contratos/>

LIMA, VEINTIDOS DE AGOSTO DEL DOS MIL VEINTITRES.



**RENZO ALBERTI SIERRA**  
NOTARIO DE LIMA



## **1. Compliance with the law**

Antamina's employees will comply with all laws applicable to the operations carried out by the company. Moreover, they must be aware of the fact that when they act in a personal capacity, they must comply with existing laws and avoid getting involved in activities which are contrary to the law.

Many of the company's activities are subject to complex and changing laws which in some cases could conflict with each other, both in Peru and foreign countries; however, ignorance of the law is no excuse for disobedience. Therefore, employees must avoid any behavior which could be construed as contrary to the laws in force in any jurisdiction where the company carries out its operations, and the Legal & Compliance Vice presidency must be consulted in the event there are any doubts with respect to this subject.

## **2. Anti-corruption**

We are committed to acting with integrity. We prohibit and do not tolerate bribery and corruption in any form and regardless of the method used.

Every relationship and preliminary talks between Antamina's employees and public officers or third parties will be conducted in such a way so as to avoid jeopardizing the integrity or good name of the company or that of public or private officers or third parties.

This is why no Antamina employee or third parties acting on behalf of Antamina will give, offer, promise, receive or request payments or some other type of economic or other compensation to (or from) public or private officers or their family members to obtain any benefit for the company or personal benefits.

Employees will inform the Compliance area in writing or call confidentially to "Antamina's Ethics Hotline" if they are asked to pay a bribe or any other type of economic or other compensation.

For more information about these and other anti-corruption guidelines, please refer to the Anti-Bribery Policy and/or contact the Compliance area.

## **3. Conflict of Interests**

The term Conflict of Interests is defined as any situation where the personal interests of an employee are contrary to or could interfere with his/her job duties with Antamina. If a conflict exists, then the employee's decision could be influenced by his/her personal interests and will not necessarily consider the best interests of the company. Employees must avoid every situation where a conflict of interests could exist. Accordingly, in all cases where a Conflict of Interests may exist, the employee must report it in writing to the Compliance area, before a Conflict of Interests actually arises.

To determine whether or not a Conflict of Interests exists, employees must assess whether or not any of the activities where they participate within or outside of the company can:



### CERTIFICACION

CERTIFICO QUE EL DOCUMENTO DEL REVERSO ES LA VERSION VIGENTE AL MES DE AGOSTO DEL DOS MIL VEINTITRES DEL DOCUMENTO DENOMINADO "CODE OF CONDUCT" DE "COMPAÑIA MINERA ANTAMINA S.A." Y QUE A LA FECHA SE ENCUENTRA ALOJADO EN LA PAGINA WEB [WWW.ANTAMINA.COM](http://WWW.ANTAMINA.COM) CON EL SIGUIENTE LINK: <https://www.antamina.com/socios-estrategicos/apendice-de-contratos/>

LIMA, VEINTIDOS DE AGOSTO DEL DOS MIL VEINTITRES.

  
**RENZO ALBERTI SIERRA**  
NOTARIO DE LIMA



- a. Limit the period of time, level of concentration or rest time required by an employee to properly perform his/her job duties in Antamina; or
- b. Imply interceding with someone, whether directly or indirectly, in order for a family member or close friend to get a job in Antamina or with any of its strategic partners; or
- c. Create an obligation which could affect the decisions made by the employee on behalf of Antamina (like, for instance, committing himself/herself to select a contractor due to personal interests and not to serve the best interests of the company); or
- d. Affect the sound judgment or capacity of the employee to determine what is the best decision for Antamina.

Moreover, all employees must make sure that the measures taken and decisions made in their work area are not influenced by interests which could be reasonably considered as contrary to the interests of the company.

For more information about this subject, please refer to the valid version of the Conflict of Interest Standard and/or consult with the Compliance area.

#### **4. Gifts and business courtesies**

Delivering and/or receiving gifts and business courtesies could be considered bribery, depending on the context and/or the type of gift or business courtesy. In this case, the employee's behavior could be called into question and could damage the image of the employee and the good name of Antamina. Therefore, before delivering or receiving a gift and/or business courtesy from a third party, employees must make sure that they comply with the provisions set forth in the valid version of the "Procedure for Delivering and Receiving Gifts and Business Courtesies" which is available on the company's Intranet. If there is any doubt as to the right course of action to be followed, then the Compliance area should be consulted.

#### **5. Asset and data protection**

Every Antamina employee, by the mere fact of being a company employee, is obliged to protect the company's assets and use them only for their intended purposes. When we speak of assets, we are referring to both tangible and intangible assets; that is, to equipment, inventories, information systems, software, hardware, money, intellectual property, and information. Goods delivered to employees as work tools cannot be used for private or personal purposes.

All employees are obliged to treat any restricted, sensitive and/or confidential company information to which they may have access confidentially. Accordingly, if an Antamina employee handles or obtains non-public restricted, sensitive and/or confidential information, then said employee will refrain from disclosing it to third parties, unless the employee has been previously authorized to do it. Moreover, the employee cannot use said information to obtain personal economic gains.

By way of reference, the following information is deemed to be confidential: records, reports, documents, devices, processes, plans, work programs, budgets, methods, accounting, financial

### CERTIFICACION

CERTIFICO QUE EL DOCUMENTO DEL REVERSO ES LA VERSION VIGENTE AL MES DE AGOSTO DEL DOS MIL VEINTITRES DEL DOCUMENTO DENOMINADO "CODE OF CONDUCT" DE "COMPAÑIA MINERA ANTAMINA S.A." Y QUE A LA FECHA SE ENCUENTRA ALOJADO EN LA PAGINA WEB [WWW.ANTAMINA.COM](http://WWW.ANTAMINA.COM) CON EL SIGUIENTE LINK: <https://www.antamina.com/socios-estrategicos/apendice-de-contratos/>

LIMA, VEINTIDOS DE AGOSTO DEL DOS MIL VEINTITRES.

  
**RENZO ALBERTI SIERRA**  
NOTARIO DE LIMA





and legal information, drawings, and other sensitive documents and information that the company may have or may have not made available to its employees are confidential.

All information obtained from suppliers, customers and third parties during the course of negotiations and operations is also deemed to be confidential and is subject to the restrictions established in this section. This information cannot be used against said suppliers, customers and third parties when dealing with their competitors. Similarly, strategic partners, customers and third parties cannot use the company's information, brand (including its logotype, isotype, and slogan), audiovisual material, business stationery used for making presentations, advertisement or, in general, for their own benefit, without previously being authorized to do it by the company's Corporate Communications Department.

Public statements or articles containing information related to the company's business or activities, other than material prepared by the company's Corporate Communications Management during the ordinary course of business, need to be approved by this area and, depending on the nature of the messages, they must also be approved by the President – General Manager (CEO).

Within the framework of the Constitution, Antamina reserves the right to monitor, control and audit the use by employees of institutional information systems delivered to the employees to perform their job duties and access electronic communications or information stored in the company's systems, devices or equipment in order to consolidate information, check information security matters, and make sure that they are not being used for purposes other than those for which they were delivered or for purposes which are contrary to the law or to Antamina's policies. Said information systems are delivered to employees exclusively for work-related purposes.

## **6. Good faith**

During the course of Antamina's operations, employees will act at all times in good faith and behave in such a manner so as to promote mutual respect between the company and its stakeholders. False or deceitful behaviors intended to benefit the interests of the company or personal interests will not be accepted.

Within the framework of this guideline, employees will be obliged to behave in a proper manner in order to be able to perform their respective job duties. Accordingly, they are obliged to comply with the principles of probity, diligence, loyalty and honesty. These are basic principles which are inherent in every employment relationship in every context.

Antamina has signed several agreements with strategic partners, customers, financial institutions and government agencies, undertaking a series of commitments in said agreements. The employees in charge of managing said agreements must diligently make sure that these commitments are fulfilled.

## **7. Books and records**

The company's books and records must reflect all the transactions performed by the company in a precise and timely manner.

### CERTIFICACION

CERTIFICO QUE EL DOCUMENTO DEL REVERSO ES LA VERSION VIGENTE AL MES DE AGOSTO DEL DOS MIL VEINTITRES DEL DOCUMENTO DENOMINADO "CODE OF CONDUCT" DE "COMPAÑIA MINERA ANTAMINA S.A." Y QUE A LA FECHA SE ENCUENTRA ALOJADO EN LA PAGINA WEB [WWW.ANTAMINA.COM](http://WWW.ANTAMINA.COM) CON EL SIGUIENTE LINK: <https://www.antamina.com/socios-estrategicos/apendice-de-contratos/>

LIMA, VEINTIDOS DE AGOSTO DEL DOS MIL VEINTITRES.

  
**RENZO ALBERTI SIERRA**  
NOTARIO DE LIMA





Funds, payments, liabilities, bank accounts or assets which have not been disclosed or otherwise have been unduly recorded in the books of account of the company are not permitted. It is absolutely prohibited to use company assets or funds for any illegal or inappropriate purpose. In addition, it is absolutely prohibited to pay secret commissions or any other type of direct or indirect compensation to persons representing customers, suppliers, contractors, competitors or government or non-government agencies or to family members or partners of any of the aforementioned parties.

Those responsible for the company's accounting books and records are expected to remain vigilant in order to ensure compliance with the provisions set forth in this section.

## **8. Prevention of Money Laundering and Terrorism Financing**

Money laundering refers to the transactions performed by one or more individuals or legal entities to conceal the illegal origin of assets or funds originating from criminal activities. Money laundering usually involves several transactions which are aimed at concealing any trace of the illegal origin of the resources. These illegal behaviors are punishable under Peruvian law.

At Antamina, we are committed to ensuring that the activities carried out by our employees comply with the internal rules and policies of the company, and this is why we are committed to acting with transparency and honesty and carrying out the necessary due diligence examinations in order to take appropriate action to assess the integrity of our counterparts.

Any transaction or operation which could be considered unusual or suspicious must be reported immediately to the Compliance area.

## **9. Political contributions**

It is prohibited to use the company's funds, property, assets or services to make contributions to political parties, candidates, campaigns or referendums, unless the company's President grants its written authorization and the Board gives its approval, with the recommendation of the Advisory Committee.

The contributions referred to in the foregoing paragraph include money or anything of value, such as assets, services, loans, excessive courtesies, trips, and the use of Antamina's facilities or assets.

Antamina respects its employees' right to participate in political activities, provided they do it in a personal capacity, not as company representatives. Employees will not be reimbursed for any political contribution they make, whether directly (through any type of payment) or indirectly (for example, by purchasing a ticket to attend a political fundraising event).

Moreover, political activities carried out by employees must take place outside of the office and never during working hours. Furthermore, employees may not use Antamina's goods and assets (including electronic mail) to carry out the activities mentioned in this section.

### CERTIFICACION

CERTIFICO QUE EL DOCUMENTO DEL REVERSO ES LA VERSION VIGENTE AL MES DE AGOSTO DEL DOS MIL VEINTITRES DEL DOCUMENTO DENOMINADO "CODE OF CONDUCT" DE "COMPAÑIA MINERA ANTAMINA S.A." Y QUE A LA FECHA SE ENCUENTRA ALOJADO EN LA PAGINA WEB [WWW.ANTAMINA.COM](http://WWW.ANTAMINA.COM) CON EL SIGUIENTE LINK: <https://www.antamina.com/socios-estrategicos/apendice-de-contratos/>

LIMA, VEINTIDOS DE AGOSTO DEL DOS MIL VEINTITRES.

  
**RENZO ALBERTI SIERRA**  
NOTARIO DE LIMA





## **10. Diversity, inclusion and non-discrimination**

Employees will support and promote Antamina's diversity and inclusion policy to provide a work environment where everyone is treated with respect and is afforded equal opportunities based on merit, keeping the workplace free of all forms of discrimination and harassment.

Accordingly, discrimination or any form of harassment at any company level or at any time during the employment relationship will not be tolerated. It applies to matters like hiring, promotion, training opportunities, salary management, benefits, and termination of the employment relationship. Employees must be treated in the same way and their opportunities will depend on their merits and capacity to carry out their work.

Similarly, the company will show respect for differences in age, race, origin, gender, sexual orientation, culture, religion and physical capacity between persons. Employees must be sure that Antamina is a diverse and inclusive company which respects their dignity and protects their rights. Employees are entitled not to be sexually harassed or not to suffer any other type of personal harassment and can report any such event in the manner described in this document and in the applicable national legislation.

## **11. Health and Safety**

Health and safety are the responsibility of each and every Antamina employee and are a priority for the company. We promote a culture of prevention and are aware of and comply with our internal health and safety policies. We have a safety management system in place to assess and mitigate the risks inherent in our activities and have also developed audit processes to regularly check its fulfillment and promote continuous improvement.

All Antamina employees are obliged to thoroughly comply with all applicable health & safety guidelines and are entitled to refrain from performing and/or stop any practice which fails to comply with established health and safety standards.

## **12. Human Rights and Sustainable Development**

Respecting and promoting human rights are two key aspects of sustainable development. Antamina will play the role of a social catalyst (i) promoting multi-actor spaces through participation and shared responsibility at the local, regional and national level, while improving access to human rights, and (ii) promoting territorial competitiveness by developing infrastructure and building capacity, among other activities.

Therefore, Antamina and its employees undertake to:

- a. Respect the culture, identity, traditions and values of both individuals and stakeholders related or linked to the company's operations;
- b. Participate in the community's sustainable social, economic and institutional development, promoting a multi-actor participation model;
- c. Frequently engage the community and hold talks with community members by promoting a multi-actor participation model which allows achieving the goals



### CERTIFICACION

CERTIFICO QUE EL DOCUMENTO DEL REVERSO ES LA VERSION VIGENTE AL MES DE AGOSTO DEL DOS MIL VEINTITRES DEL DOCUMENTO DENOMINADO "CODE OF CONDUCT" DE "COMPAÑIA MINERA ANTAMINA S.A." Y QUE A LA FECHA SE ENCUENTRA ALOJADO EN LA PAGINA WEB [WWW.ANTAMINA.COM](http://WWW.ANTAMINA.COM) CON EL SIGUIENTE LINK: <https://www.antamina.com/socios-estrategicos/apendice-de-contratos/>

LIMA, VEINTIDOS DE AGOSTO DEL DOS MIL VEINTITRES.

  
**RENZO ALBERTI SIERRA**  
NOTARIO DE LIMA



set by the community, seeking sustainable benefits which have a positive social impact.

- d. Take the necessary steps in order for social and environmental impact assessments, including decision-making processes, to be participatory and inclusive, in line with the established legal framework and rules.

### **13. Environmental responsibility**

All Antamina employees are included within the scope of the Environmental Management System and are responsible for following up and complying with the environmental objectives, standards, procedures, and indicators. Moreover, Antamina has issued 10 Environmental Rules which all employees and strategic partners are required to fulfill. All these requirements are to be met in all our operations.

Moreover, Antamina and its employees are committed to:

- a. Continuously improving their environmental performance.
- b. Assessing and managing risks and potential impacts on biodiversity and ecosystems in the operations.
- c. Helping build a circular economy in the operations in order to reduce the generation of wastes and reuse and recycle materials.

### **14. Water management and climate change**

We recognize that water is a vital resource and, considering the effects of climate change, we clearly identify the relationship and strong link that exists between both components, for which reason it is necessary to take action and generate commitments.

We are committed to responsibly managing water from a watershed approach considering all stakeholders concerned, the efficiency of water management in the operations, and continuous improvement. Moreover, we comply with the existing environmental laws, standards, and policies established for our operations.

### **15. Competition**

We believe in competition and do not take part in inappropriate practices which are considered anti-competitive. We are committed to thoroughly complying with competition rules and requiring third parties with which the company relates to thoroughly fulfill said rules.

By way of reference, sharing our strategic partners' non-public information (prices, strategies, business plans) with their competitors can be considered an anti-competitive practice.

If there is any doubt or suspicion about any practice which could be considered anti-competitive, the Compliance area should be contacted immediately to receive advice.

### **16. Other company policies**

The company has set up policies, procedures and standards with respect to its different processes (logistics, commercial, financial, technological, etc.). All employees must know,

### CERTIFICACION

CERTIFICO QUE EL DOCUMENTO DEL REVERSO ES LA VERSION VIGENTE AL MES DE AGOSTO DEL DOS MIL VEINTITRES DEL DOCUMENTO DENOMINADO "CODE OF CONDUCT" DE "COMPAÑIA MINERA ANTAMINA S.A." Y QUE A LA FECHA SE ENCUENTRA ALOJADO EN LA PAGINA WEB [WWW.ANTAMINA.COM](http://WWW.ANTAMINA.COM) CON EL SIGUIENTE LINK: <https://www.antamina.com/socios-estrategicos/apendice-de-contratos/>

LIMA, VEINTIDOS DE AGOSTO DEL DOS MIL VEINTITRES.

  
**RENZO ALBERTI SIERRA**  
NOTARIO DE LIMA





respect, and comply with the guidelines established by each company area, the updated versions of which are available on the company's Intranet, so ignorance is no excuse for disobedience.

## **17. Violations of the Code of Conduct**

The non-fulfillment of any of the provisions of this document constitutes a breach of the Code of Conduct and is contrary to good faith in employment, so it can result in the termination of employment, even in the filing of civil and criminal actions, as appropriate.

Any person who becomes aware of any possible violation of the Code of Conduct of Antamina is obliged to report it immediately.

Violations of the Code of Conduct can be reported through the Ethics Hotline, which is managed by an independent third party in order to guarantee that callers will remain anonymous and that the report will remain confidential.

Reports can be submitted through the following channels:

- Website: [www.lineaetica-antamina.com](http://www.lineaetica-antamina.com)
- E-mail: [denuncias@lineaetica-antamina.com](mailto:denuncias@lineaetica-antamina.com)
- Phone: 0 800 18112 or 219 7102

It is the company's policy to inform its shareholders, through the Board Committee designated for such purpose, of any reports that the company has received through the Ethics Hotline.

The Compliance area and the Ethics Committee will be in charge of leading the investigation of all reports received. If the investigations show that there has been a violation of the provisions of Antamina's Code of Conduct or a labor misconduct, then a disciplinary process will start in accordance with the provisions set forth in the Disciplinary Measures Procedure. If the violation involves an illegal activity, then the company will analyze whether or not it is convenient to report the violation to the competent authorities.

Any employee who retaliates or threatens to retaliate against a person who reports a violation of the Code of Conduct will be subject to a disciplinary procedure.

## **18. Distribution**

This Code of Conduct will be delivered to all Antamina employees in a physical and/or electronic format, as appropriate.

Moreover, the Code of Conduct will also be made available to our strategic partners and stakeholders on our website.

**The President and General Manager (CEO) and the Vice President Legal and Compliance are responsible for the overall administration of the Code of Conduct.**

**August 2021**

### CERTIFICACION

CERTIFICO QUE EL DOCUMENTO DEL REVERSO ES LA VERSION VIGENTE AL MES DE AGOSTO DEL DOS MIL VEINTITRES DEL DOCUMENTO DENOMINADO "CODE OF CONDUCT" DE "COMPAÑIA MINERA ANTAMINA S.A." Y QUE A LA FECHA SE ENCUENTRA ALOJADO EN LA PAGINA WEB [WWW.ANTAMINA.COM](http://WWW.ANTAMINA.COM) CON EL SIGUIENTE LINK: <https://www.antamina.com/socios-estrategicos/apendice-de-contratos/>

LIMA, VEINTIDOS DE AGOSTO DEL DOS MIL VEINTITRES.

  
**RENZO ALBERTI SIERRA**  
NOTARIO DE LIMA

