

20  
24

# Comprehensive Corporate Compliance Policy

 BUENAVENTURA

## MESSAGE FROM OUR CHAIRMAN OF THE BOARD

We are pleased to announce a milestone in Buenaventura's organizational culture: the implementation of the Comprehensive Compliance Policy. This reinforces our commitment to regulatory and ethical compliance in all our operations and stakeholder relationships.

The Comprehensive Compliance Policy will guide our actions under fundamental principles of ethics, integrity, anti-corruption, care and respect for the environment and local communities. It is essential that all Buenaventura's teams recognize and adopt these principles to preserve Buenaventura's integrity and standing.

We encourage everyone to become familiar with this policy and incorporate it into our daily activities. I thank you for your adherence to our values and principles, and I am confident that together we will create a sustainable and ethical future for Buenaventura.

**Roque Benavides**  
Chairman of the Board



**#CulturadeCumplimiento**



**¡Vamos!**  
BUENAVENTURA

## MESSAGE FROM OUR GENERAL MANAGER

Buenaventura family:

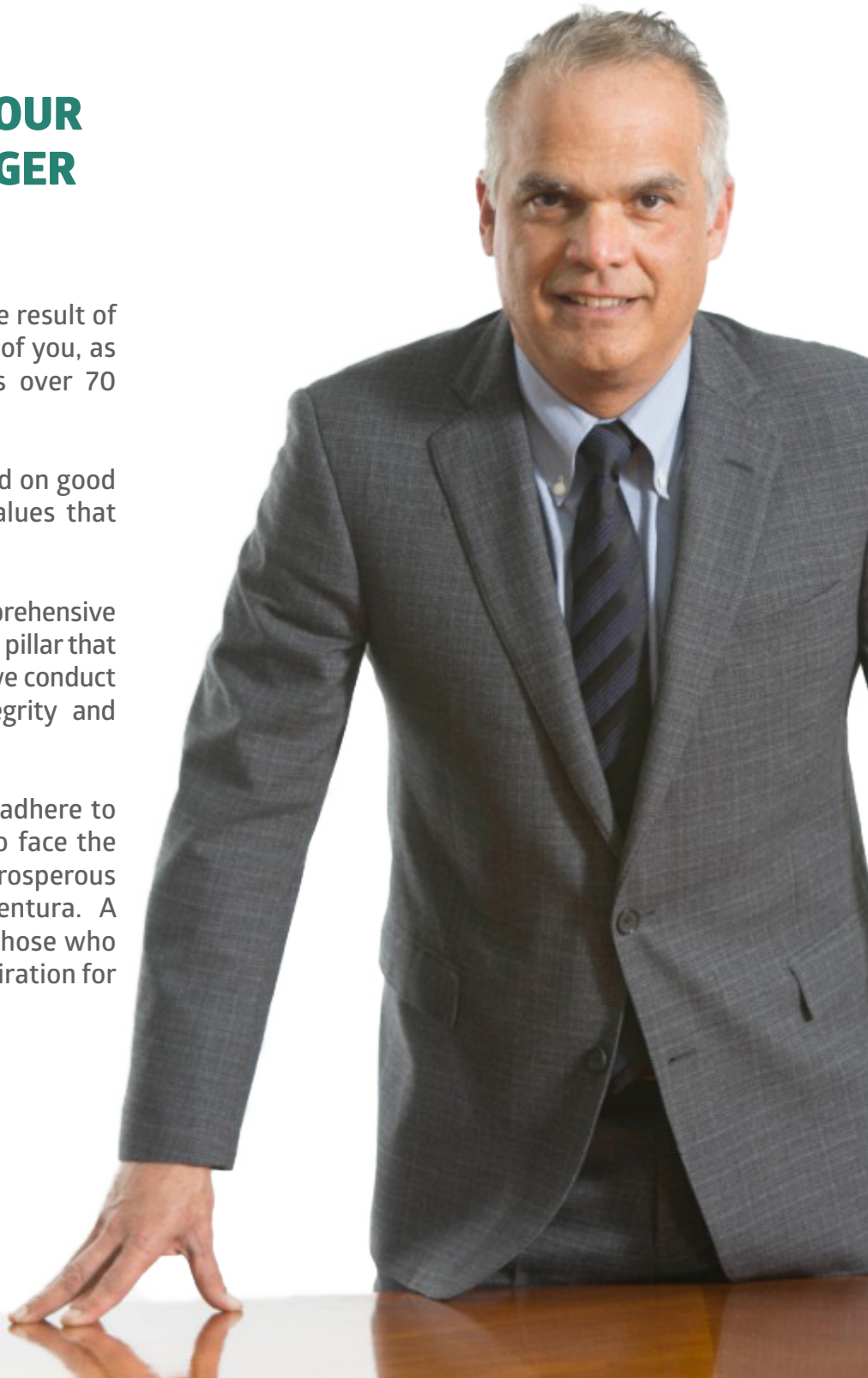
Our solid corporate standing is the result of the effort and dedication of each of you, as well as those who preceded us over 70 years ago.

Our success and identity are based on good ethical conduct and corporate values that define us as a company.

In that sense, Buenaventura's Comprehensive Compliance Policy is a fundamental pillar that directs our efforts, ensuring that we conduct our operations with utmost integrity and adherence to regulations.

It is with a deep commitment to adhere to this policy that we will be able to face the current challenges and build a prosperous and ethical future for Buenaventura. A future that honors the legacy of those who preceded us and serves as an inspiration for generations to come.

**Leandro García**  
General Manager



#CulturadeCumplimiento





## INDEX

<b>I. OBJECTIVE AND SCOPE.</b> .....	<b>2</b>
<b>II. COMMITMENTS</b> .....	<b>2</b>
1. ETHICS, INTEGRITY AND GOOD CORPORATE GOVERNANCE. ....	2
2. ESG – ENVIRONMENTAL, SOCIAL AND GOVERNANCE. ....	2
3. REJECTION OF BRIBERY AND CORRUPTION. ....	4
4. REJECTION OF MONEY LAUNDERING AND THE FINANCING OF TERRORISM. ....	6
5. REJECTION OF CORPORATE FRAUD. ....	8
6. SOCIAL SUPPORT, CHARITABLE CONTRIBUTIONS, DONATIONS, SPONSORSHIPS. ....	9
7. RELATIONSHIP WITH STATE ENTITIES AND PUBLIC OFFICIALS. ....	12
8. BUSINESS PARTNERS. ....	16
9. INTERNATIONAL SANCTIONS. ....	18
10. INFORMATION AND REGULATORY TRANSPARENCY.....	19
11. PROTECTION OF PERSONAL DATA. ....	21
12. COLLABORATORS, PROPER USE OF ASSETS, CORPORATE INFORMATION. ....	22
13. GIFTS AND HOSPITALITY. ....	26
14. CONFLICTS OF INTEREST. ....	28
15. REPORTING CHANNEL. ....	29
16. INTERNAL RECORDS AND CONTROLS. ....	32
17. CONTINUOUS IMPROVEMENT.....	33
<b>III. CORPORATE COMPLIANCE AREA.</b> .....	<b>34</b>
a. OBJECTIVE. ....	34
b. ORGANIZATION AND FUNCTIONS.....	34
c. AUTONOMY AND COLLABORATION WITH PREVENTION BODIES AND OTHER AREAS. ....	36
e. CORPORATE COMPLIANCE PROGRAM (PREVENTION MODEL). ....	37
<b>IV. MANUALS, POLICIES &amp; OTHER DOCUMENTS.</b> .....	<b>39</b>
<b>V. DEFINITIONS.</b> .....	<b>39</b>
<b>VI. AFFIDAVIT OF ACKNOWLEDGEMENT AND COMPLIANCE WITH COMPREHENSIVE CORPORATE COMPLIANCE POLICY</b> .....	<b>41</b>





## I. OBJECTIVE AND SCOPE.

This **Comprehensive Corporate Compliance Policy** summarizes the main corporate compliance commitments of the entities that comprise the “Buenaventura Group”, highlighting the importance of respecting the pillars of our [Code of Ethics and Good Conduct](#) and complying with applicable national and foreign regulations. The scope of this Policy applies to all [Collaborators](#) of the Buenaventura Group.

## II. COMMITMENTS.

The Buenaventura Group establishes the following main corporate compliance commitments:

### 1. ETHICS, INTEGRITY AND GOOD CORPORATE GOVERNANCE.

This first commitment focuses mainly on responsible business decision-making, on the coherence and honesty of our actions, and on transparent and correct business management. The implementation of the principles of ethics, integrity and good corporate governance contained in our [Code of Ethics and Good Conduct](#) promotes reliability and transparency within the Group, as well as sustainability in our business environment.

### 2. ESG – ENVIRONMENTAL, SOCIAL AND GOVERNANCE.

ESG refers to the set of criteria used to evaluate and measure an organization's performance in areas related to the **environment, social responsibility, and corporate governance**. At Buenaventura, we are fully committed to following ESG criteria to demonstrate how our Group balances its operational and business practices under ethical, sustainable and social considerations, in addition to our quality of corporate governance and internal management.

In the "Sustainability" section of our corporate website we detail our **Social Management** commitments: Relationships, Local Employment, Purchasing and Local Services; Productive Development; Infrastructure and Human Development, among others. In the same section we also detail our main **Environmental Management** commitments: Water Management, Environmental Innovation, Citizen Participation and Mine Closure.

For more information, see: <https://www.buenaventura.com/en/sostenibilidad>

Our sustainability reports, published annually since 2008, are available at: <https://www.buenaventura.com/en/noticias-y-medios/publicaciones/sost>



Additionally, we have an **Integrated Management System** that includes **Quality, Environment, Occupational Health and Safety** ("SIB").

The SIB encompasses the organizational structure, activity planning, responsibilities, procedures, and resources required to conduct, implement, review, maintain, and improve our environmental, quality, and safety performance. To achieve these objectives, we work to obtain internationally recognized certifications, such as ISO 9001 (Quality Management System), ISO 14001 (Environmental Management System) and ISO 45001 (Occupational Health and Safety Management System). These certifications are based on a set of systematic guidelines for environmental, quality and safety aspects, allowing us to measure our performance according to globally accepted standards.

For more information about the SIB, our ISO certifications, policies, management procedures, manuals, guides, plans, operational management formats and other documents related to our SIB system.

See: <https://www.buenaventura.com/en/sostenibilidad/sib>

The most important aspects of our corporate governance are detailed in the **Corporate Governance** section of our website, including information about our organization and internal management, policies, important facts and other relevant aspects.

See: <https://www.buenaventura.com/en/inversionistas#gobierno-corporativo>



### 3. REJECTION OF BRIBERY AND CORRUPTION.

The Buenaventura Group rejects all types of practices and conducts that may be linked to acts of corruption. Our commitment against bribery and corruption is underpinned and focused on the following:

#### i. ZERO TOLERANCE.

The Buenaventura Group does not accept or permit any type of corrupt, illegal or unethical act in its operations, business relationships and activities, so it will not give rise to any form of corruption and will take strong measures to prevent, detect and punish it. Our corporate commitment to zero tolerance to corruption seeks to establish an environment of integrity, ethics, honesty and transparency in all company interactions and decisions.

We support this important commitment through our [Code of Ethics and Good Conduct](#), ongoing education and targeted training, whistleblowing procedures, periodic audits and evaluations of our internal controls, clear disciplinary actions, and a uniform and thorough evaluation process for our [Business Partners](#), among others.

#### ii. FCPA – FOREIGN CORRUPT PRACTICES ACT.

In addition to its obligations under regulations and legislation in Peru, due to Compañía de Minas Buenaventura S.A.A. having the status and qualification as a foreign private issuer by virtue of its registration with the New York Stock Exchange [NYSE: BVN], the Buenaventura Group is subject to compliance with obligations under the laws of the United States of America. The Buenaventura Group has designed and implemented a tailor-made [Corporate Compliance Program](#) to also comply with the FCPA, which is the anti-corruption legislation of the United States that prohibits the bribery of public officials and penalizes the lack of internal controls, false or inadequate accounting records.

Every Collaborator of the Buenaventura Group must familiarize themselves with the main concepts of the FCPA. It is mandatory to participate in anti-corruption training and other trainings with the periodicity determined by our Compliance team. You can obtain a copy of the Annual Compliance Activity Plan by writing to [cumplimiento@buenaventura.pe](mailto:cumplimiento@buenaventura.pe)



## FCPA: GENERAL VIEW

**What does it sanction?**  
Payment, offer or authorization

**Of what?**  
Anything of value.

**To whom?**  
Public Official

**What is the reason?**  
Intentionally inducing or influencing an action or decision of a public official to obtain or retain business or a commercial benefit.

**“Commercial or business purpose”:**  
Awarding public tenders; avoiding or paying reduced taxes, fees or fines; obtaining exemptions required under a regulation; modified deadlines; etc.

**Vamos!**  
BUENAVENTURA

### iii. PERU ANTI-CORRUPTION.

[Buenaventura Group's Corporate Compliance Program](#) also satisfies the requirements contained in the national anti-corruption regulations in Peru for the Prevention Model and also includes specific obligations applicable to the mining industry.

The liability of the legal entity in Peru includes:

- The crime of transnational bribery and administrative liability for the crimes of bribery of national or foreign public officials;
- Money laundering and financing of terrorism;
- Fraud in the administration of the legal entity; and,
- Crimes against cultural property, tax, customs and terrorism crimes.

Every Collaborator of the Buenaventura Group must know and familiarize themselves with the main concepts of anti-corruption regulations in Peru. To this end, it is mandatory to participate in anti-corruption training with the periodicity determined by the Compliance team.

You can obtain a copy of the Annual Compliance Activity Plan by writing to [cumplimiento@buenaventura.pe](mailto:cumplimiento@buenaventura.pe)





#### **iv. FACILITATION PAYMENTS; EXTORTION.**

Facilitation payments refer to sums of money or in-kind benefits that are offered or granted to public officials for the purpose of expediting or facilitating government procedures or services that are routine, non-discretionary, and legally necessary.

The Buenaventura Group does not offer or grant any amount of cash or the delivery of [Something of Value](#) to public officials to perform their routine duties. Notwithstanding the foregoing and taking into account possible limitations of government resources in the different geographical areas in which the Buenaventura Group operates, on an exceptional basis and in prior coordination with the Compliance area, we may authorize providing transportation, food and lodging services to public officials to carry out their routine functions.

Extortion payments are those forced or coerced payments that a person, company or entity makes under threat or coercion, by individuals or groups seeking to obtain an economic, political or personal benefit without legitimate justification.

Extortion can take various forms, such as physical threats, reputational damage, blackmail, kidnapping, dissemination of sensitive information, among other methods. The Buenaventura Group rejects all types of extortion because it is illegal, contravenes a lawful purpose and perpetuates an illegitimate cycle that does not guarantee security or the cessation of threats. Notwithstanding this, the safety of all our [Collaborators](#) is our top priority, so we inform and train all our Partners to respond in an informed manner to these unfortunate situations.

It is mandatory to participate in anti-corruption trainings with the periodicity determined by the Compliance team. You can obtain a copy of the Annual Compliance Activity Plan by writing to [cumplimiento@buenaventura.pe](mailto:cumplimiento@buenaventura.pe)

#### **4. REJECTION OF MONEY LAUNDERING AND THE FINANCING OF TERRORISM.**

##### **i. MONEY LAUNDERING.**

Money laundering, also known as money laundering, is a process by which profits obtained through illicit activities reach a legal and lawful appearance after going through a series of financial and commercial transactions.



The main purpose of money laundering is to conceal the illicit origin of funds, so that they can be used without raising suspicion. Money laundering is a crime that undermines the integrity of the financial system and can be related to criminal activities such as illicit drug trafficking, illegal mining, migrant smuggling, kidnapping, corruption, theft, pimping, human trafficking, fraud, terrorist financing, as well as any other illicit activity with the capacity to generate illegal profits.

To prevent and combat money laundering, Grupo Buenaventura has a System for the Prevention of Money Laundering and Financing of Terrorism ("SPLAFT"), as well as has established strict due diligence measures as part of its [Corporate Compliance Program](#) to verify the legality of the funds and the [Business Partners](#) with whom it is linked.

**ii. SPLAFT – SYSTEM FOR THE PREVENTION OF MONEY LAUNDERING AND FINANCING OF TERRORISM.**

In our country, there are laws and regulations specifically designed to prevent and combat money laundering and terrorist financing. The SPLAFT is the set of rules, procedures and mechanisms that obliged entities must follow to identify, prevent and report unusual and suspicious activities that could be related to money laundering or terrorist financing.

Some of the companies of the Buenaventura Group (Compañía de Minas Buenaventura S.A.A., Procesadora Industrial Rio Seco S.A., Compañía Minera Coimolache S.A. and Minera La Zanja S.R.L.) qualify as an "obligated subject" before the Superintendence of Banking, Insurance and AFP, so the Buenaventura Group has an adequate System for the Prevention of Money Laundering and Financing of Terrorism or "SPLAFT." This involves the implementation of due



diligence measures, the identification and verification of customers, suppliers, collaborators and other counterparties, as well as the constant monitoring of transactions and the reporting of suspicious transactions to the relevant authorities.

This auditable and auditable system, already implemented by the Buenaventura Group and specifically detailed in our [SPLAFT Manual](#), is crucial to prevent the financial and economic system of our country from being used as a means for illicit activities, also allowing us to contribute to national and international security and stability.

## 5. REJECTION OF CORPORATE FRAUD.

Corporate fraud is defined as deceptive, illegal, or dishonest practices that are carried out within an organization with the goal of obtaining undue financial benefits or unfair advantages.

These practices are usually carried out by Collaborators, managers or other people within an organization and can harm the interests of the company, its shareholders, customers, [Collaborators](#) and other stakeholders.

The Buenaventura Group rejects the various forms that corporate fraud can take, including without limitation, bribery in all its forms and scopes, conflict of interest, unfair competition, financial and accounting fraud, embezzlement of funds and assets, improper manipulation of purchasing and procurement processes, false or exaggerated claims to insurance companies, market manipulation, manipulation of time records, false expense reports, hiring fraud, among others.

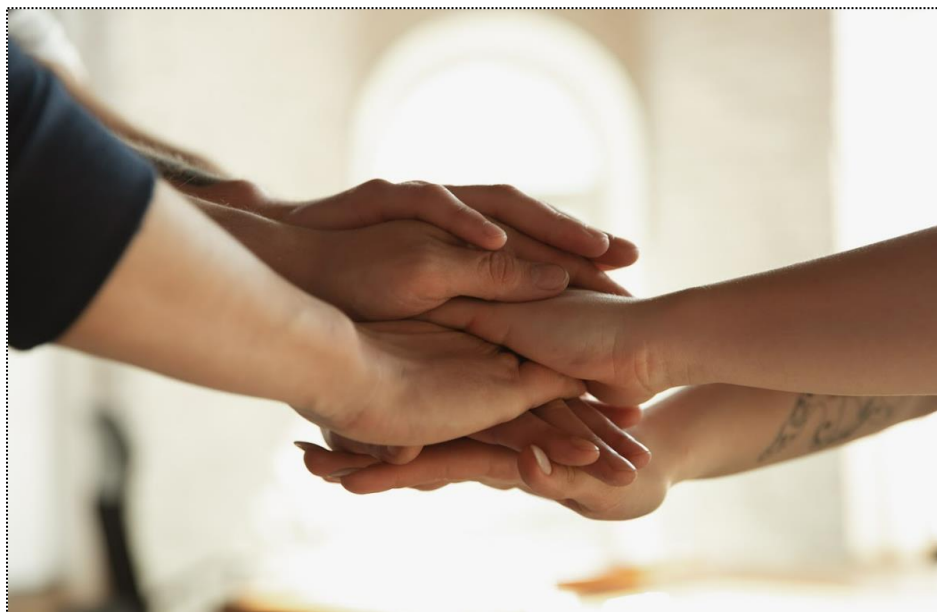




To prevent and combat corporate fraud, the Buenaventura Group has established internal controls, internal and external audits, and targeted training for all its [Collaborators](#) as part of its [Corporate Compliance Program](#).

## 6. SOCIAL SUPPORT, CHARITABLE CONTRIBUTIONS, DONATIONS, SPONSORSHIPS.

All social support, charitable contributions, donations and sponsorships that the Buenaventura Group decides to attend and/or carry out must be granted in strict compliance with the applicable legislation, our [Code of Ethics and Good Conduct](#), applicable internal policies, the following guidelines and the detailed mechanism and process outlined in the [Authorization of Expenses \("AOEs"\) Manual](#) which covers Social Support, Charitable Contributions, Donations or Sponsorships.



### i. SHARED SOCIAL RESPONSIBILITY.

One of the Buenaventura Group's main commitments is to promote self-sustainable development and improve the quality of life of the people and communities that live in its local, regional and national area of influence.

Our focus on shared social responsibility and self-sustainable development seeks an efficient and integrated balance between the economic, social and environmental dimensions of all our beneficiaries, promoting an environment in which they can thrive today without depleting the resources of future generations.



## ii. CORPORATE RESILIENCE.

We seek that our social support, charitable contributions, donations and sponsorships are directly or indirectly related to our own activities or initiatives, related to or related to the Buenaventura Group, contributing to our corporate resilience within the framework of sustainable development and shared social responsibility. Thus, we prioritize social support, charitable contributions, donations and sponsorships in the following areas:

- a) **Education:** Implementation, equipment, promotion and strengthening of educational institutions, higher education centers, universities, charitable institutions, associations supporting children and young people of extreme poverty in the area of social influence of the Buenaventura Group, including investments in nutrition programs and projects, construction, expansion and/or improvement of educational infrastructures, promotion and implementation of scholarship programs and related activities.
- b) **Health:** Implementation, equipping and/or strengthening of health centers, hospitals, health networks and micro-networks, including the realization or promotion of medical campaigns and the provision of medical care services in favor of the inhabitants of the Buenaventura Group's area of social influence, including investments in construction, expansion or sanitation of health infrastructures and facilities, and related activities.
- c) **Responsible Mining:** Promotion, dissemination and participation in boards of trustees and events that promote environmental care and the responsible development of the mining industry.
- d) **Culture, Tradition and Customs:** Promotion, dissemination and encouragement of books, publications, productions and cultural events linked to knowledge, dissemination of the populations in the area of social influence of the Buenaventura Group, as well as support in the participation and implementation of traditional festivals and other events of cultural value.
- e) **Capacity Building:** Implementation, development and promotion of courses, forums, training events for the strengthening of technical, agricultural, agro-industrial, and other competencies that serve to achieve self-sustainable development that improves the quality of life of the inhabitants in the area of social influence of the Buenaventura Group.
- f) **Research and Innovation:** Promotion, dissemination and encouragement of research and innovation projects in science, technology and related fields.
- g) **Infrastructure for Competitiveness:** Promotion, development and encouragement of investment projects that result in the self-sustainable





development and well-being of the populations in the Buenaventura Group's area of influence, including involvement in the preparation of pre-investment and investment studies, as well as direct or indirect participation in their execution.

**iii. IMPORTANT CONCEPTS.**

In the decision-making process involving ESG criteria, that is, in our commitments to self-sustainable development, shared social responsibility and corporate strengthening, the following concepts are required to be known and understood by all Buenaventura Group [Collaborators](#):

What does it mean?	
<b>Social Support</b>	Free and voluntary delivery of Something of Value to a Recipient or Final Beneficiary for a purpose of a social or cultural nature or for the benefit of a community.
<b>Charitable Contribution</b>	Free and voluntary delivery of Something of Value to a Recipient or Beneficial Owner for a charitable or charitable purpose.
<b>Donations</b>	Free and voluntary delivery of Something of Value to a Recipient or Beneficial Owner.
<b>Sponsorship</b>	Voluntary surrender of Something of Value to support an event, project, association, organization or natural or legal person.
<b>Ultimate Beneficiary Owner (UBO)</b>	Individuals or entities persons who ultimately hold, control or utilize the goods, services or benefits provided.
<b>Recipient</b>	Individuals, private or public entities in favor of whom the donation, charitable contribution or delivery of Something of Value is made. The Recipient is not necessarily the Beneficiary.
<b>Something of Value</b>	Anything that has value (good, service, benefit), with no minimum amount.

**iv. AUTHORIZATION PROCESS FOR EXPENSES LINKED TO SOCIAL SUPPORT, CHARITABLE CONTRIBUTIONS, DONATIONS, SPONSORSHIPS.**

All social support, charitable contributions, donations, sponsorships and, in general, any delivery of [Something of Value](#) by any entity of the Buenaventura Group, regardless of the amount or economic value of the same, are subject to the procedure detailed in the [Authorization of Expenses \("AOEs"\) Manual](#) related to Social Support, Charitable Contributions, Donations or Sponsorships.



This procedure applies and must be known and understood by all [Collaborators](#) of the Buenaventura Group, and in particular by the staff of the Social Affairs Management (both in the mining units and projects, as well as in the Lima office), Vice Presidents and Managers.

It is mandatory that all [Collaborators](#) who, according to their functions, participate directly in the management of social support, charitable contribution, donations or sponsorships, know and become familiar with the process detailed in the [Authorization of Expenses \("AOEs"\) Manual](#) and participate in focused training on the process of authorizing expenses mentioned therein, with the frequency that is necessary or that determined by the Compliance team.

## **7. RELATIONSHIP WITH STATE ENTITIES AND PUBLIC OFFICIALS.**

The various aspects of our operations and activities entail and require a close relationship with state entities and public officials. The Buenaventura Group is committed to maintaining transparency, complying with all laws and regulations, avoiding conflicts of interest and recording its interactions with state entities and public officials, to continue building relationships based on ethics and integrity, transparency and respect, with a responsible and transparent approach.

To achieve these objectives, our relationship with state entities and public officials must comply with the [Government Interactions Protocol](#) detailed in this section, which complies with the applicable FCPA and anti-corruption regulatory framework of Peru.

### **i. FCPA - FOREIGN CORRUPT PRACTICES ACT.**

The FCPA prohibits bribery of public officials and penalizes the lack of internal controls, false or inadequate accounting records. Many concepts under the FCPA are broad, such as the definition of who is considered a public official:

The FCPA also broadly defines what is considered "something of value":



**FCPA:  
Something of Value**

Includes any type of benefit regardless of the amount:

- Money:** Commissions, discounts, debit or prepaid cards, credits, loans.
- Services:** Medical care, education, recreation and recreational activities.
- Gifts:** Jewelry, computers, clothing, art, automobiles, spa treatments.
- Travel:** Airline tickets, hotel payments, food payments.
- Opportunities:** Participation in a business, job offers, profit sharing or commissions.

*Vamos!*  
BUENAVENTURA

Our [Corporate Compliance Program](#) incorporates these and other FCPA concepts. Every Collaborator of the Buenaventura Group must know and familiarize themselves with the main concepts of the FCPA. It is mandatory to participate in anti-corruption trainings with the periodicity determined by our Compliance team.

You can obtain a copy of the agenda of the Annual Plan of Compliance Activities by writing to [cumplimiento@buenaventura.pe](mailto:cumplimiento@buenaventura.pe)

## ii. PERU ANTI-CORRUPTION REGULATIONS.

The liability of the legal entity in Peru includes the crime of transnational bribery and administrative liability for the crimes of bribery of public officials, money laundering and the financing of terrorism at the national level and abroad.

Our relationship with state entities and public officials must take into account the requirements of Peruvian regulations, in addition to the FCPA, given that the companies of the Buenaventura Group are regulated by said regulations.

Our [Corporate Compliance Program](#) incorporates the requirements of the anti-corruption regulations applicable to the Buenaventura Group in Peru. Every Collaborator of the Buenaventura Group must know and familiarize themselves with the main concepts of the anti-corruption regulations applicable to the Buenaventura Group at a national and international level. It is mandatory to participate in anti-corruption trainings with the periodicity determined by the Compliance team.



You can obtain a copy of the Annual Training Plan and Compliance Training by writing to [cumplimiento@buenaventura.pe](mailto:cumplimiento@buenaventura.pe)

### iii. GOVERNMENT INTERACTIONS PROTOCOL.

[Collaborators](#) of the Buenaventura Group may interact with state entities and public officials as long as there are business matters involved, specific to the area to which they belong and relevant to the functions that correspond to their position and functions.

All [Collaborators](#) of the Buenaventura Group, and especially those who, given the characteristics of their functions, require relationships with state entities and public officials, must comply with the following Protocol:

1. ***Appropriate Relationship:*** All interaction with state entities at all levels and/or public officials must comply with:
  - a) Applicable national or international regulations;
  - b) Be linked to matters related to the Buenaventura Group's business, for the development and execution of our ESG commitments or within the framework of other aspects determined by the Buenaventura Group;
  - c) They must be specific to the area to which they belong; and,
  - d) Be relevant to the functions of the [Collaborators](#) who perform them, corresponding to their positions and functions.
2. ***Third Parties:*** Any individual or entity that is not a Collaborator of the Buenaventura Group and to whom it is delegated, entrusted or participates in matters that involve interaction with state entities or public officials, must adhere to and contractually commit to comply with this Protocol, and must be previously evaluated following the internal process detailed in the [Business Partners](#) section.
3. ***Something of Value:*** Any delivery of [Something of Value](#) to a state entity and/or public official – including exceptionally possible legitimate and reasonable social and/or logistical support – must be previously evaluated and authorized following the procedure detailed in the [Authorization of Expenses \("AOEs"\) Manual](#) linked to Social Supports. Charitable Contributions, Donations or Sponsorships.
4. ***Ethical Conduct and Relationship Guidelines:*** In our relationship with state entities and public officials, ethical, transparent, honest, integrity and respect conduct must prevail, avoiding situations that generate or give the appearance of generating conflicts of interest, influence peddling, corruption, bribery, collusion, or any other illicit conduct,



complying with the regulations applicable to the Buenaventura Group and with our [Code of Ethics and Good Conduct](#).

In view of this, the Buenaventura Group requires that all communication be duly preserved and documented, carried out through formal channels and in writing, maintaining uniformity and transparency in the planning, development and monitoring of all interactions with state entities and public officials.

In situations in which it is necessary to participate in in-person meetings with public officials and provided that these do not involve visits and/or inspections to the facilities of the Buenaventura Group, such meetings should be prioritized to take place in the offices of the corresponding government entity.

5. **Enhanced Internal Controls:** Any contract and/or agreement of any kind or nature with a state entity or public official is subject to prior evaluation by the Legal and Compliance area to ensure the proper application of our reinforced internal controls and processes, which will be determined on a case-by-case basis, and may include, without limitation, enhanced due diligence, veto rights, audit rights, automatic termination of contracts or agreements, creation of supervisory groups, among others.
6. **Internal Registry:** In order to maintain transparency in our relationship with state entities and public officials, Grupo Buenaventura maintains a record of such relationships and interactions. You can get the internal log form by writing to [cumplimiento@buenaventura.pe](mailto:cumplimiento@buenaventura.pe)
7. **Complaints:** Any violation or suspected violation of the guidelines provided in this Protocol must be reported immediately in the manner provided in the [Reporting Channels](#) section.
8. **Focused Training:** All Collaborators of the Buenaventura Group and especially those who, given the characteristics of their functions and positions considered sensitive, need to interact with state entities and public officials, must become familiar with the guidelines of this Protocol and with the concepts of the national and international anti-corruption regulations applicable to the Buenaventura Group. It is mandatory to participate in anti-corruption trainings with the periodicity determined by the Compliance team.

You can obtain a copy of the training agenda and calendar of activities from Compliance by writing to [cumplimiento@buenaventura.pe](mailto:cumplimiento@buenaventura.pe)

#### iv. POLITICAL CONTRIBUTIONS.

The Buenaventura Group does not make political contributions or deliver [Something of Value](#) to political parties, candidates, campaigns or referendums (whether at the local, regional, national or international level).





If you have any doubts or questions about this, you can write to [cumplimiento@buenaventura.pe](mailto:cumplimiento@buenaventura.pe)

## 8. BUSINESS PARTNERS.

The relationship of the Buenaventura Group with all its Business Partners, that is, with its customers, suppliers and other counterparties with whom it is linked, is subject to a comprehensive and uniform evaluation process that consists of the following:

### i. DUE DILIGENCE.

Our due diligence checks focus on assessing the risk of our counterparties, in a methodical, strategic and personalized way for our business, respecting the applicable national and international regulations, adapting the level of scrutiny and investigation to the specific risks relevant to each business situation, allocating resources efficiently and prioritizing the most critical aspects of the process.

For detailed information on our due diligence process, including how to initiate an application, please review the [Due Diligence Process Manual](#).

Our commitment through the evaluations of the third parties with whom we interact is to ensure that they share our culture of ethics and integrity in business, to carry out a prior evaluation of all potential Business Partners before entering into a business relationship, to comply with applicable legal requirements, and to ensure the proper application of our internal controls and processes. Here are some relevant concepts:

- a. Clients:** Our clients are those who purchase the products resulting from our operations or use the services offered by the Buenaventura Group.

To start our due diligence process, our clients must complete the [Client Onboarding and Certification Form](#), known as "Know your Client" ("KYC").

The KYC form is an important measure to prevent illicit activities, comply with applicable regulations, protect the integrity and reputation of the Group, and make informed business decisions.

- b. Suppliers:** Our suppliers are diverse and cover a wide range of categories, they are those individuals or legal entities that supply a variety of products, services and resources necessary for the proper and efficient functioning of the operations of the Buenaventura Group.

Our supplier evaluation process is thorough and consists of different stages, involving a preliminary registration on our Supplier Platform; requiring completion of the [Vendor Onboarding and Certification Form](#); adhering to [the Supplier Code of Conduct](#), and after



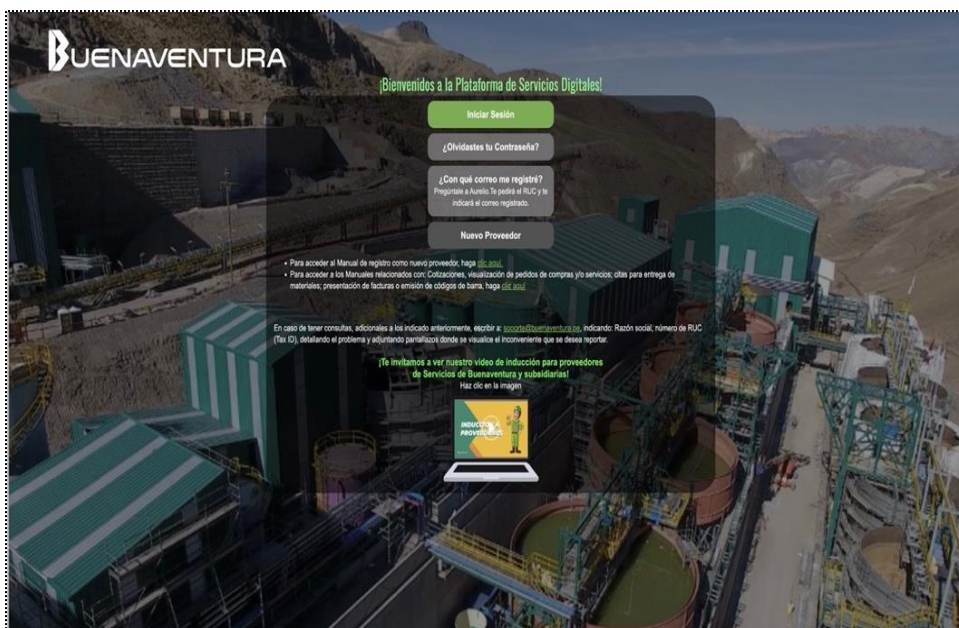
being evaluated and receiving a favorable due diligence report, if applicable, securing *onboarding* or registration as a supplier of the Buenaventura Group.

- c. **Other Counterparties:** All of our other potential Business Partners who do not necessarily qualify as Customers or Suppliers, whether joint *venture partners*, beneficial owners or others, should be evaluated before entering into a business relationship with them.
- d. **Due Diligence Process Manual:** It is the document that specifically details our internal process for evaluating counterparties with whom we engage, including how and when to request due diligence, what information must be provided, what mechanism we use to conduct our assessments, how we categorize and attribute the risk level of each of our Business Partners, how often we conduct our due diligence assessments and how the information collected is relevant to Management's interactions with such Business Partners.

## ii. DIGITAL PLATFORMS.

Our Supplier Platform is of public access and aimed at those interested in becoming suppliers of the Buenaventura Group. By accessing through our website and following the corresponding instructions, any individual or entity interested in being evaluated as a supplier has the opportunity to register their data.

This information is incorporated into a reference database for our Logistics area, which uses it when the Buenaventura Group needs to acquire a product or service, allowing an efficient way to select the necessary resources. After evaluation and selection by the Logistics area, following the criteria established by the Compliance area, potential suppliers are subjected to due diligence before their registration as a Supplier of the Buenaventura Group.





The Due Diligence Digital Platform is the customized digital platform, strictly for internal use, managed by our Compliance area, where all the due diligence records of our [Business Partners](#) are recorded, providing an updated database with relevant information from each third party, including risk levels, complete reports, red flags, recommendations from the Compliance area and other relevant information. This is a centralized, easy-to-use platform that provides statistical data about our [Business Partners](#) and helps improve our internal controls and processes.

For detailed information on our due diligence process and the Due Diligence Digital Platform, including how to access it, please review the [Due Diligence Process Manual](#).

### **iii. CORPORATE COMPLIANCE AUDITS.**

As part of our [Corporate Compliance Program](#) we are committed to conducting compliance audits of our [Business Partners](#), by way of thorough and detailed evaluations of their corporate compliance processes and practices, when our Compliance team so determines. The objective is to verify that they share our principles of ethics and integrity, comply with applicable legal regulations and compliance standards established in their contractual commitments.

These audits are non-adverse, general in scope, and pre-coordinated with our [Business Partners](#). They represent a key tool to get to know our Business Partners better, mitigate risks and ensure that our business relationships are developed in a transparent manner, following our internal policies and current regulations.

## **9. INTERNATIONAL SANCTIONS.**

### **i. OFAC.**

The Office of Foreign Assets Control, known as "OFAC," is an agency of the U.S. Department of the Treasury charged with administering and enforcing economic and financial sanctions against individuals, entities, and countries that pose a threat to the national security, foreign policy, or economy of the United States.

These sanctions may include fines, asset freezes, trade and financial restrictions, and other measures that seek to advance U.S. foreign policy and national security objectives.

The Buenaventura Group is committed to complying with OFAC's requirements, having incorporated strict internal controls and processes as part of its [Corporate Compliance Program](#), with an emphasis on evaluating all of its [Business Partners](#) in the manner described in [Section 8](#) of this Policy.



## **ii. OTHER SANCTIONS AND INTERNATIONAL LISTINGS.**

In addition to OFAC, there are several lists of individuals and companies with significant negative track records, other international sanctions, and organizations that impose similar restrictions in different regions of the world and depending on the applicable geopolitical context, including, but not limited to, the economic and financial sanctions imposed by the Council of the European Union and by the Office of Financial Assets Control in the United Kingdom, respectively, or those of the United Nations, which imposes sanctions at the global level with the aim of maintaining international peace and security.

With this in mind, the Buenaventura Group is committed to evaluating its [Business Partners](#) in the manner described in [Section 8](#) of this Policy.

## **10. INFORMATION AND REGULATORY TRANSPARENCY.**

Information and regulatory transparency refers to the practice of providing clear, complete and accessible information of the Buenaventura Group both internally and externally, especially with regard to its compliance with relevant regulations and standards, and in particular with regard to the demands of the securities markets in Peru and the United States where the company is listed. We are committed to transparent, timely, truthful and open disclosure of information about our operations, financial statements, business practices, internal processes and other aspects related to legal and regulatory compliance.

### **i. PUBLICATIONS, RELEASES, ANNOUNCEMENTS AND NEWS.**

On our corporate website, we have the section "Buenaventura Informs You" where we keep our stakeholders up to date with relevant information about the Buenaventura Group and its mining environment.

There we have a news section of a diverse nature, where we comment on issues of social, environmental, health impact, our operations, events and everything relevant to activities in the areas of influence.

In the Investors section, we include publications and reports on results, permits, production, financial aspects and other topics relevant to the development of our business and commercialization.

### **ii. SMV - SUPERINTENDENCY OF THE SECURITIES MARKET.**

The Superintendency of the Securities Market ("SMV"), an entity attached to the Ministry of Economy and Finance, is a specialized technical body whose purpose is to ensure the protection of investors, the efficiency and transparency of the markets under its supervision, the correct formation of prices and the dissemination of all information necessary for such purposes.



Compañía de Minas Buenaventura S.A.A. ["BUENAVC1"] and Sociedad Minera El Brocal S.A.A. ["BROCALC1"] are issuers before the SMV, which implies the fulfillment of obligations designed to ensure transparency, the disclosure of accurate and timely information, and the protection of its investors.

Grupo Buenaventura is committed to complying with all of its obligations as an issuer nationwide, including but not limited to the following:

- (i) Submit audited and unaudited financial reports on a regular basis, including full financial statements and explanatory notes, thus providing a clear and accurate view of the Group's financial health;
- (ii) Inform the SMV and the public of any relevant fact or event that may significantly affect the value of the securities issued, communicating any "material fact" immediately;
- (iii) Submit quarterly and annual reports of its financial and operating results;
- (iv) Register its securities before offering them to the public, complying with the registration and disclosure requirements established by the SMV;
- (v) Ensure that its shareholders with relevant holdings report to the SMV when their shareholding reaches certain predefined thresholds;
- (vi) Provide information on the structure of the board, steering committees, and independent directors;
- (vii) Implement a [Corporate Compliance Program](#) to ensure that our operations comply with applicable laws and regulations; and,
- (viii) Adopt corporate governance codes that promote transparent and ethical management and direction practices.

### iii. SEC.

The SEC refers to the *U.S. Securities and Exchange Commission*, the independent U.S. government agency charged with regulating and supervising securities markets and securities-related activities in the United States.

The SEC plays a critical role in protecting investors, maintaining the integrity of markets, and promoting transparency in the financial arena. Since 1996, Compañía de Minas Buenaventura S.A.A. has been considered a foreign private issuer before the SEC, issuing securities called *American Depositary Receipts (ADRs)* in the United States and is subject to a series of obligations and requirements.





Grupo Buenaventura is committed to complying with all of its obligations as a foreign issuer to the SEC, including, without limitation, the following:

- (i) Present periodic financial and operational information, including annual, quarterly and other periodic reports including audited financial statements and explanatory notes;
- (ii) Comply with the SEC's disclosure rules by providing detailed information on its capital structure, financial results, risks and other aspects relevant to investors;
- (iii) Provide information on specific topics, such as changes in management, operations, and risks related to your home country, among others;
- (iv) Comply with the provisions of the Sarbanes-Oxley Act that apply to foreign issuers, including the evaluation and certification of internal controls and the prohibition of lending to directors and executives;
- (v) Use auditors registered with the *Public Company Accounting Oversight Board (PCAOB)* to audit its financial statements, ensuring the quality and reliability of the audit;
- (vi) File an annual report on Form 20-F with the SEC, providing detailed financial and non-financial information about the issuer and its operations;
- (vii) Provide updates on significant changes in its activities, operations, or risks in periodic reports; and,
- (viii) Comply with disclosure and filing obligations with the SEC on an ongoing basis while its ADRs are outstanding in the United States.

## **11. PROTECTION OF PERSONAL DATA.**

Personal data protection includes a set of measures (technical, legal and organizational) and regulations designed to ensure the privacy and security of individuals' personal information.

Personal information may include details such as names, addresses, phone numbers, email addresses, financial data, medical records, and any other data that can identify an individual.

The main purpose of personal data protection is to regulate how sensitive information is collected, stored, processed, shared, and used to protect the rights and privacy of individuals.

The Buenaventura Group is committed to the protection of personal data, with specific guidelines to ensure adequate treatment and protection of the personal data that is collected, stored and managed in the companies of the Buenaventura Group, in compliance with applicable regulations.



These guidelines are detailed in our [Corporate Personal Data Protection Policy](#).

## **12. COLLABORATORS, PROPER USE OF ASSETS, CORPORATE INFORMATION.**

### **i. WHO ARE BUENAVENTURA GROUP COLLABORATORS?**

[Collaborators](#) are all individuals who maintain an employment relationship with the Buenaventura Group, whether they work at any of our offices in Lima, mining units and projects in any part of the national territory and those who are under their direction and control, as well as their executives, directors and those individuals who have a formal employment relationship with the Group and receive compensation for their services.

### **ii. HOW DO WE EVALUATE COLLABORATORS?**

All Buenaventura Group hires, including those of Collaborator applicants, are subject to the due diligence process detailed in our [Due Diligence Process Manual](#).

The result of the due diligence verification of all applicants for Collaborator will lead to decisions regarding their hiring and the reinforced measures that are required according to each particular case, in compliance with our [Corporate Compliance Program](#), this Policy and all internal and external regulations applicable to the Buenaventura Group.

### **iii. WHAT ARE THE OBLIGATIONS OF OUR COLLABORATORS?**

All Collaborators are obliged to accept in writing and comply with our [Code of Ethics and Good Conduct](#), this Policy and all internal and external regulations applicable to the Buenaventura Group. In particular, Collaborators must comply with the [Internal Work Regulations \("RIT"\)](#), through which the Buenaventura Group establishes rules of conduct subject to current labor regulations, which determine rights and obligations for both the company and the Collaborators. Labor relations at Grupo Buenaventura are based on current legislation and especially on the spirit of collaboration, understanding and harmony in order to ensure the achievement of Grupo Buenaventura's objectives and the well-being of its Collaborators.

### **iv. PROPER USE OF ASSETS.**

All Buenaventura Group resources and assets must be used responsibly, efficiently and in accordance with our objectives and policies. The Group's assets include a wide range of items, such as machinery, equipment, facilities, intellectual property, technology, information, vehicles, inputs, and all other resources owned by the Buenaventura Group.

The proper use of these assets is part of our [Corporate Compliance Program](#) and involves a series of principles and practices that ensure their optimal use and alignment with the interests and values of the Buenaventura Group.



The main commitments for the proper use of the Buenaventura Group's assets include:

- a. **Efficiency and Productivity:** Using assets efficiently means maximizing their value and performance while minimizing waste. This can include properly scheduling equipment usage, optimizing available resources, and finding ways to improve productivity.
- b. **Regulatory Compliance:** The proper use of our assets must be in line with applicable laws and regulations. It also implies complying with this Policy, with our [Code of Ethics and Good Conduct](#), and with all the processes, internal controls and policies of the organization, which range from our ESG obligations to the management of confidential information, technology and personal data, among many others.
- c. **Care and Maintenance:** Assets must be properly maintained and cared for to extend their useful life and ensure their optimal functioning.
- d. **Security:** Assets must be used appropriately while maintaining high levels of security to prevent damage, theft, and risks, including digital and cyber security mechanisms to protect our information, intellectual property, and the responsible use of our physical assets.
- e. **Not Wasting Resources:** We must avoid unnecessary or frivolous use of assets to preserve the resources of the Buenaventura Group and ensure that they are available when they are really needed.
- f. **Respect for Corporate Information: Correctly** using the intellectual property of the Buenaventura Group and respecting copyright is essential in order not to violate the laws and protect our intangible assets.
- g. **Accountability:** [Collaborators](#) must be responsible for the use of assets, be accountable, and explain how they are using them.

**v. CORPORATE INFORMATION.**

The protection and proper safeguarding of Grupo Buenaventura's Corporate Information is essential to ensure our long-term success, self-sustaining development goals and protect our good reputation.

Buenaventura Group Corporate Information includes all types of data, communications, knowledge, records and documents that belong to the Group and that are used to carry out its business operations. This information is broad and may include financial data, business strategies, employee records, intellectual property, customer information, operational, acquisition, marketing plans, legal documents, and any information related to the operation and decision-making of the Buenaventura Group. Corporate Information is valuable to our organization and can be both tangible and intangible.



[Collaborators](#) must not use digital platforms or applications (such as WhatsApp, Facebook, Instagram or similar), or personal equipment to disclose, store or share Buenaventura Group Corporate Information. Doing so represents a violation of this Policy, as it would not allow Grupo Buenaventura to meet its obligations to adequately safeguard its Corporate Information, a commitment that we take very seriously.

**vi. TARGETED EDUCATION AND TRAINING.**

To ensure that all our Collaborators are adequately aware of their obligations in terms of corporate compliance, we have an annual agenda of activities, information resources and focused trainings.

You can obtain a copy of the training agenda and calendar of activities by writing to our Compliance area at [cumplimiento@buenaventura.pe](mailto:cumplimiento@buenaventura.pe)

**vii. DISCIPLINARY MEASURES.**

Failure by our [Collaborators](#) to comply with our [Code of Ethics and Good Conduct](#), as well as with the internal policies and regulations applicable to the Buenaventura Group, including this Policy, entails possible sanctions and the implementation of disciplinary measures, in accordance with the [Internal Work Regulations \("RIT"\)](#), which will be determined after the evaluation of each particular situation.

It is important that our [Collaborators](#) cooperate fully in our internal investigations of potential breaches. Failure to cooperate during an internal investigation may also result in the imposition of disciplinary action.

Disciplinary actions vary in severity depending on the seriousness of the situation and may include the dismissal of the Collaborator from his/her duties, reassignment of responsibilities, the return of bonuses, commissions or similar incentives for Collaborators who qualify as Officers pursuant to our Clawback Policy, as well as the temporary suspension from work while the investigation is carried out without the right to compensation, as well as the possible application of fines or other sanctions in accordance with current labor legislation.

It is important to mention that these measures do not exclude the possibility of taking legal and criminal action as appropriate.

It is essential that our [Collaborators](#) comply with the ethical standards and regulations established by the Buenaventura Group. Failure to comply can result in both disciplinary and legal consequences, depending on the severity of the situation. The cooperation of our Partners in internal investigations is essential to maintain the integrity and compliance of our corporate Group.



### **viii. EXCLUSIVE DEDICATION, INCOMPATIBILITIES AND EXCEPTIONS.**

The Buenaventura Group requires its [Collaborators](#) with a subordinate labor regime and indefinite-term contracts to perform their work exclusively for Buenaventura.

Unless the Buenaventura Group expressly authorizes an exception, no Collaborator should perform work in favor of any other employer or provide services, advice, consulting or paid work of any kind in favor of third parties in general, including government entities, regardless of the modality of contracting (external advice, fixed-term contract, or any other modality) during their tenure as a Collaborator of the Buenaventura Group under an indefinite term contract.

Likewise, all our [Collaborators](#), regardless of their employment regime with the Buenaventura Group, must understand and accept that the exercise of their functions within the Group is intrinsically incompatible with the performance of any type of public function, so that all our [Collaborators](#) are prevented from accepting any appointment to a public office or participating as a political candidate for an elected office while they maintain a link with the Group Buenaventura.

Failure to comply with the requirements of exclusivity or the transgression of the incompatibilities indicated herein constitute a serious misconduct that will give rise to the disciplinary measures detailed in [Section vii](#) of this Clause 12.

### **ix. PEPs.**

A "PEP" is an acronym that refers to a "Politically Exposed Person." Refers to individuals, nationals or foreigners, who hold or have held prominent public functions in a governmental entity or international organization, or who are or have been a direct contributor to any of the latter, within the last five (5) years.

This group of people, due to their position, has a higher level of risk of exposure to corruption, money laundering, or other illicit practices.

PEPs can include political leaders, senior government officials, diplomats, and others with significant influence in the political arena. Due to the risks associated with the possible misuse of its position for personal or illicit purposes, Grupo Buenaventura conducts due diligence of all PEPs, in accordance with the process described in [Section 8\(i\)](#) of this Policy, before establishing any potential business relationship with such PEPs, requiring enhanced measures and controls as the case may be to mitigate and prevent risks.



#### x. LIMITATIONS ON THE HIRING OF FORMER CIVIL SERVANTS.

In addition to the requirements, incompatibilities and measures detailed in sub-sections viii and ix of Section 12, the Buenaventura Group is committed to complying with the applicable regulations in our country related to the hiring of former public officials, including, but not limited to, the requirements of Law 31564, Law on the Prevention and Mitigation of Conflict of Interest in the Access and Exit of Public Service Personnel and its Regulation, Supreme Decree No. 082-2023-PCM, which aims to prevent and mitigate conflicts of interest linked to the access and exit of public service personnel, establishing obligations and impediments applicable to certain persons in the public and private sector during their work or contractual activity and at the end of it, in order to strengthen the fight against corruption.

Our [Corporate Compliance Program](#), as well as our internal processes and controls, in particular the Due Diligence detailed in [Section 8](#), ensure adequate compliance with the limitations regarding the hiring of former public officials.

#### 13. GIFTS AND HOSPITALITY.

It is essential that our [Collaborators](#) comply with the ethical standards and regulations established by the Buenaventura Group regarding the receipt or delivery of Gifts and Hospitality.

The cooperation and execution of our [Collaborators](#) with the following guidelines is essential to maintain the integrity and compliance of the Buenaventura Group. For the purposes of this Policy:

- **Gift:** Means [Something of Value](#) other than Hospitality.
- **Hospitality:** Means the offering or payment of any type of transportation, food, drink, accommodation, or any activity or experience that is intended to provide fun, pleasure, or relaxation.







#### i. GIFTS AND HOSPITALITY TO COLLABORATORS.

The [Collaborators](#) of the Buenaventura Group are prohibited from accepting or receiving gifts or hospitality of any kind, either directly or indirectly, that are linked to the development of their functions, activities or obligations of their position.

Gifts and/or gifts of promotional items, bearing the logo of a Business Partner, or hospitality for a legitimate commercial concept, that have a total face value of less than US\$. 50.00 (Fifty and 00/100 US dollars) and that do not have a frequency of less than six (6) months, are excluded.

In the event that a Collaborator receives any gift or hospitality from a Business Partner or any third party that is not part of the Buenaventura Group that does not comply with the promotional or commercial exception provided herein, he/she must immediately notify the Compliance area, through the [Gifts Registration Form](#).

#### ii. GIFTS AND HOSPITALITY TO THIRD PARTIES.

Gifts and hospitality to third parties may be made on an exceptional basis, subject to compliance with the corresponding internal authorization levels and verification by the Compliance area, strictly following the following guidelines:

- ✓ **Purpose and Motivation:** Any gift or hospitality must have a legitimate commercial purpose and not intended to unduly influence recipients.
- ✓ **Promotional Items:** Preference should be given to gifts or promotional items bearing the Buenaventura Group logo, as they are suitable for promoting our business brand and strengthening business relationships.
- ✓ **Face Value:** Any gift or hospitality must have a face value and in no case exceed a total value of US\$. 50.00 (Fifty and 00/100 US dollars) over the course of six (6) months to the same recipient.
- ✓ **Nature:** The nature of the gift must be adequate and ethically appropriate according to the situation, activity and recipient, always taking into consideration the limitations of total value allowed.
- ✓ **Transparency:** The offering and delivery of gifts or hospitality to third parties must be carried out through public and transparent channels, without the use of intermediaries or sending through closed channels or channels that are difficult to identify.
- ✓ **Records:** It is important to keep all receipts and documentation pertinent to the gift or hospitality and provide them to the Accounting/Finance and Compliance area, indicating



all the details such as the purpose, value and identity of the recipients, in order to have clear and accurate records of all gifts, gifts or hospitality.

- ✓ **Perception and Conflict of Interest:** It is essential to avoid any situation where the giving of a gift or hospitality represents or may be perceived as a conflict of interest or as an attempt to gain a commercial advantage. The appearance of impropriety should always be avoided.
- ✓ **Legal and Ethical Requirements:** The Compliance area, and if necessary in the Legal area, must carefully evaluate each situation involving a gift or hospitality, prior to its realization, to ensure that it complies with the applicable legal and ethical requirements.

### iii. GIFTS AND HOSPITALITY TO GOVERNMENT ENTITIES AND/OR PUBLIC OFFICIALS.

It is not permitted to give any type of gift or hospitality of any value, even nominal, to a public entity or official. Only gifts or gifts of promotional items bearing the Buenaventura Group logo and with a nominal value are excluded.

[Social Support, Charitable Contributions, Donations, and Sponsorships](#) described in Section 6 of this Policy are not considered gifts or hospitality and may be granted in strict compliance with applicable legal legislation, our [Code of Ethics and Good Conduct](#), our applicable internal controls, and the process detailed in the [Authorization of Expenses \("AOEs"\) Manual](#) linked to Social Support, Charitable Contributions, Donations or Sponsorships.

Failure to comply with these Gifts and Hospitality guidelines is a violation of this Policy and will result in disciplinary action and possible legal action, depending on the severity of the non-compliance.

## 14. CONFLICTS OF INTEREST.

### i. WHEN IS THERE A CONFLICT OF INTEREST?

A conflict of interest occurs when an individual or entity has personal or financial interests that may influence their ability to make impartial or fair decisions in a particular situation.

In essence, a conflict of interest can arise when there is a discrepancy between a person's duties and responsibilities and their personal or financial interests. These conflicts can occur in a variety of contexts, including professional, financial, governmental, and personal.

Buenaventura Group requires all its [Collaborators](#) to be strictly ethical, loyal and compliant with its internal processes and controls, avoiding situations that influence their actions or prejudice their opinions when handling matters within their competence, especially in situations that could present a conflict between their personal interests and those of Grupo Buenaventura.



If you have any doubts or questions about this, you can write to [cumplimiento@buenaventura.pe](mailto:cumplimiento@buenaventura.pe)



## ii. DISCLOSURE AND MANAGEMENT OF CONFLICTS OF INTEREST.

Buenaventura Group believes that transparency is fundamental in the management of conflicts of interest and encourages the open and honest disclosure of potential conflicts in order to mitigate their negative effects and allow the parties involved to make informed decisions.

In addition, we evaluate all [Collaborators](#) applicants as detailed in [Section 12](#) of this Policy, mitigating incompatibilities and conflicts of interest. We are committed to mitigating and managing any conflict of interest in an adequate, transparent and objective manner, promoting timely disclosure by our [Collaborators](#), writing to [cumplimiento@buenaventura.pe](mailto:cumplimiento@buenaventura.pe) with the appropriate detail.

## 15. REPORTING CHANNEL.

### i. BUENAVENTURA ETHICS LINE.


The Buenaventura Group has implemented and maintains a Whistleblowing Channel (known as the "BVN Ethics Line") that is available to its [Collaborators](#) and [Business Partners](#). This channel offers the possibility of informing the Group about any event that is suspected of being



criminal, fraudulent or irregular, as well as breaches of the [Code of Ethics and Good Conduct](#), policies, processes and internal controls and situations that may affect the fundamental ethical and integrity values of the Buenaventura Group.



The management of the Whistleblowing Channel is in the hands of an independent specialist firm, which ensures that the information provided is kept confidential and protected against alteration or deletion. In addition, independent management ensures the confidentiality of the identities of all parties involved in the process.

The Collaborator or Business Partner may file or report complaints, anonymously or by identifying themselves, through the mechanisms published for these purposes on the Buenaventura Group's corporate website. The informant (complainant) must describe the facts that support their complaint and provide information relevant to its proper investigation, such as circumstances, names, positions, areas, dates, or any additional information that is considered of interest. You will also have the possibility of attaching files that can serve as evidence of the reported fact.




**Buenaventura Ethics Line**  
YOUR REPORT, OUR COMMITMENT

**Know the channels to file a complaint**

Download on  Google Play    Download on  App Store

Download the ethics global app or access the website:

  
<https://lineaeticabuenaventura.ethicsglobal.com/>



## ii. WHAT CAN BE REPORTED, REPORTED AND/OR DENOUNCED?

The BVN Ethics Line offers the possibility of informing the Buenaventura Group about any fault, infraction or violation of its [Code of Ethics and Good Conduct](#), policies, controls and internal processes, as well as about any event or action that is suspected of being criminal, fraudulent, unethical or irregular, in addition to situations that may affect the fundamental ethical and integrity values of the Buenaventura Group.

## iii. ANONYMITY AND NON-RETALIATION.

The Buenaventura Group guarantees that those [Collaborators](#) or [Business Partners](#) who file a complaint through the BVN Ethics Line do not face retaliation, discrimination and/or intimidation that endangers their integrity, contractual relationship with the Buenaventura Group or their job position.

Likewise, if the identity of the informant (complainant) is known, it will not be disclosed to third parties unrelated to the investigation of the incident. The Buenaventura Group is committed to maintaining the confidentiality of all information received and ensuring a fair and transparent process for all parties involved.

## iv. INTERNAL INVESTIGATION PROCESS.

All complaints filed via the BVN Ethics Line are received by the external operator independent of the whistleblowing channel, from which an alert is automatically sent to the Incident Committee.

The internal committees appointed by the Group: [the Ethics Committee](#), [the Incident Committee](#) and [the Audit Committee](#) share the prevention function with the Compliance area with regard to internal investigations, as detailed in the section on [Collaboration with Prevention Bodies and other areas](#).

The aforementioned Committees, as appropriate according to their functions, carry out a preliminary work of investigation, evaluation and verification of each of the complaints received, whether it has been received through the BVN Ethics Line, or through any other channel, and based on the information provided by the informant (complainant), a preliminary evaluation of it and its possible impacts is carried out. to then refer the complaint to the Internal Audit Management in case it merits the initiation of an internal investigation.

All investigations are led by the Internal Audit Manager, who conducts them ensuring transparency and objectivity in their process and can seek advice from specialists (internal or external) when circumstances warrant it. The internal investigation involves collecting the statements of the complainant, the accused and witnesses, evaluating evidence, documents, communications, among other procedures.



During the investigation, any person under investigation shall have the right to know the accusation and may make his or her exculpatory or defense, by means of his or her statement and presentation of documents, as well as appoint, if warranted, a lawyer of his or her choice and at his or her own expense, who may participate in the proceedings. During the investigation, the following rights of the person under investigation will be taken into account:

- (i) Be clearly informed of the facts for which you are being investigated;
- (ii) The right to review the various charges and/or evidence against them, as well as to have access to the investigation file before any decision is taken. However, the identity of the person who has confidentially made the complaint may not be revealed;
- (iii) To make allegations and present the means of proof that it deems appropriate;
- (iv) Designate an attorney to participate during interviews or have access to the file; and,
- (v) The presumption of innocence shall be maintained and the right against self-incrimination shall be respected, which implies that the investigating body is prohibited from using coercive means to obtain confessions of guilt.

After the internal investigation has been completed and the corresponding report has been prepared, the Committee in charge will decide whether to apply disciplinary measures and the corresponding legal actions. The decision shall be duly reasoned and documented in writing, and if it is a sanctioning decision, the seriousness of the facts and the certainty of its commission shall be taken into account.

Exceptionally, the Committee in charge may request an additional discharge from the respondent on specific points necessary to take a decision, provided that they are not those already developed during the investigation.

## 16. INTERNAL RECORDS AND CONTROLS.

Buenaventura Group's accounting books and records are instrumental in promoting the transparency, traceability and integrity of its business practices and corporate compliance commitments. Our main objectives related to books, records and internal controls are the following:

- a. **Transparency and Accountability:** Accurate and detailed accounting records allow us to provide transparency about Grupo Buenaventura's financial and operational activities. This, in turn, allows for clear accountability both within our organization and to external stakeholders, such as regulators and shareholders.
- b. **Prevention of Corruption, Fraud and Embezzlement:** The proper recording of our financial transactions makes it difficult to conceal illicit activities, fraud and prevents the





misuse of resources, making it more efficient to detect, prevent and mitigate fraud, embezzlement and/or acts of corruption.

- c. **Detection of Irregularities:** The analysis of adequate accounting records allows us to detect and anticipate unusual and/or irregular patterns in the transactions of the Buenaventura Group, facilitating the early detection of suspicious activities, which in turn allows us to take preventive measures before irregularities become major problems and generate negative impacts, fines and/or sanctions by the competent entities.
- d. **Legal and Regulatory Compliance:** Accurate and detailed accounting records allow us to document compliance with applicable national and international regulations.
- e. **Assessment and Auditing:** Proper accounting records facilitate our internal and external audits, which in turn allows for an accurate assessment of our financial and corporate compliance processes.
- f. **Informed Decision Making:** Accurate and up-to-date financial information derived from accounting records is crucial to making informed decisions in the management of Grupo Buenaventura. This allows financial data to be analyzed to identify trends and opportunities, and strategies to be adjusted as needed.
- g. **Corporate Compliance Culture:** Maintaining adequate accounting records and complying with all applicable regulations contributes to our corporate compliance culture, reinforcing the image of the Buenaventura Group.

## 17. CONTINUOUS IMPROVEMENT.

### i. RISK ANALYSIS.

Conducting regular risk analysis is essential to ensure that the Buenaventura Group operates ethically and legally at all times, adapting to new risks that may arise in the face of changing business and regulatory conditions, allowing us to proactively identify and address compliance challenges. Risk analysis is an important component of our [Corporate Compliance Program](#).

The main objective is to identify, evaluate and mitigate in a constant and timely manner the risks related to ethical, legal and operational compliance faced by our Group, confirming which are the areas that face the greatest risks, taking into account our business culture and the scope of our operations.

Without prejudice to having the [Buenaventura Integrated System \(SIB\)](#) to ensure the adequate identification and mitigation of risks at the operational level, the corporate compliance risk analysis seeks the continuous improvement of our risk mitigation



mechanisms, reducing any gap between our current mitigation processes and the acceptable levels of identified risk.

**ii. DIGITALIZATION AND ARTIFICIAL INTELLIGENCE ("AI").**

Digitalization is essential for efficiency, competitiveness and adaptability in the global business environment in which the Group operates, as it allows us to streamline processes, innovate, automate some routine tasks, save time and reduce costs, as well as collect and analyze various internal data, contributing to the verification of our corporate compliance. On the other hand, we consider it important to remain alert and informed regarding the new trends in the use of artificial intelligence in the corporate environment. Despite their many benefits, digitalization and artificial intelligence also pose challenges and negatives that need to be addressed appropriately.

Within our corporate compliance commitments linked to digitalization and artificial intelligence, we highlight the protection of personal data, according to the guidelines detailed in our [Corporate Personal Data Protection Policy](#); the Proper Use of Assets, Corporate Information and the rights of our [Collaborators](#), in accordance with the provisions of this Policy and the provisions of our [Internal Work Regulations](#).

**III. CORPORATE COMPLIANCE AREA.**

**a. OBJECTIVE.**

The Compliance area ensures the proper observance of each of the Buenaventura Group's corporate compliance commitments detailed in this Policy, the [Corporate Compliance Program](#), and the System for the Prevention of Money Laundering and Financing of Terrorism, highlighting the importance of respecting the pillars of our [Code of Ethics and Good Conduct](#) and to comply with all relevant national and foreign regulations. The Compliance function is part of the Legal and Corporate Compliance Area (hereinafter, the "Compliance Area"), in which the General Counsel also holds the position of Compliance Manager of the Buenaventura Group.

**b. ORGANIZATION AND FUNCTIONS.**

The Corporate Compliance function in the Buenaventura Group is led by the Corporate Compliance Officer, who occupies a managerial rank in the Buenaventura Group and has autonomous powers of initiative and control in his area of competence, being responsible for the development, implementation, supervision, and operation of the [Corporate Compliance Program](#) (Prevention Model) and the System for the Prevention of Money Laundering and Financing of Terrorism.

The Corporate Compliance Officer is appointed by the Board of Directors and may be removed from office only by the Board of Directors. During the period of his/her



appointment, he/she will be responsible for the functions of Prevention Officer for purposes of Law 30424 and its Regulations, and will report directly to the General Manager and, functionally, to the Board of Directors. The Corporate Compliance Officer reports to the Board of Directors on a regular basis and at least annually on aspects of his/her competence.

The decisions adopted by the Board of Directors and/or General Management related to the Corporate Compliance Program and its annual budget will be communicated to the Compliance Officer for execution. The main functions of the [Corporate Compliance Program](#) are as follows:

- (i) Determine, implement and supervise the proper functioning of the Corporate Compliance Program (Prevention Model);
- (ii) Supervise compliance with internal control policies and measures, in coordination with the different areas and committees of the company;
- (iii) Issue reports on the Corporate Compliance Program or the Compliance area when circumstances warrant it and at least annually;
- (iv) Present to the Board of Directors the necessary recommendations for the improvement of the Corporate Compliance Program, as appropriate;
- (v) Request information -without limitation- from the different areas of the company;
- (vi) Delegate functions to those in charge of each relevant area of the company for the supervision and control of the operation of the Corporate Compliance Program;
- (vii) Plan and develop the Annual Plan of Compliance Activities, as well as the calendar of activities of the Compliance area;
- (viii) Coordinate, organize and implement the company's Money Laundering and Terrorist Financing Prevention System.

The Head of Compliance leads the operational and day-to-day aspects of the Compliance area, supporting and reporting to each of the Corporate Compliance Officer's functions. In addition, he supervises the work of analysts, assistants and coordinators of the Compliance area.

Compliance analysts, assistants and coordinators report directly to the Head of Compliance and must perform the duties assigned to them by the Corporate Compliance Officer or the Head of Compliance.



**c. AUTONOMY AND COLLABORATION WITH PREVENTION BODIES AND OTHER AREAS.**

The Compliance function in the Buenaventura Group is autonomous and operates independently, contributing objectively and adequately to the management and supervision of its [Corporate Compliance Program](#) (Prevention Model). Without prejudice to its operational independence, the Compliance area requires close collaboration with the other areas of the company, and in particular, with the following prevention bodies when it comes to internal investigations involving Buenaventura Group [Collaborators](#):

**1. INCIDENT COMMITTEE.**

In charge of making decisions regarding internal investigations carried out for non-compliance or irregularities committed by Grupo Buenaventura [Collaborators](#), as well as cases with an economic impact of less than US\$. 100,000.00 (one hundred thousand and 00/100 US dollars). The Committee is made up of:

- Corporate Compliance Officer;
- Human Resources Manager (Ethics Officer); and,
- Project Manager (Operations Representative).

This Committee meets as necessary, and adopts decisions regarding corrective measures, sanctions and implementation of controls for cases within its competence, which will be mandatory. The corrective measures, sanctions or dismissal adopted by this Committee will be executed by the Human Resources Management.

**2. ETHICS COMMITTEE.**

Responsible for the decision-making of internal investigations involving Managers or Directors and that involve an economic impact greater than US\$100,000.00 (one hundred thousand and 00/100 US dollars) and less than US\$1,000,000.00 (One million with 00/100 US dollars). This Committee is made up of:

- General Manager (permanent member);
- Ethics Officer (permanent member);
- Corporate Compliance Officer (permanent member);
- Project Manager (permanent member); and,
- Vice President of the area involved (invited if the case warrants it).

This Committee meets as necessary and its decisions regarding corrective measures, sanctions and implementation of controls for cases within its competence are mandatory.



### 3. AUDIT COMMITTEE.

Made up of appointed members of the Board of Directors, in charge of evaluating and deciding on internal investigations classified as Level 1 or "Major Impact", involving members of the Board, General Manager or Vice Presidents with an economic impact greater than US\$. 1,000,000.00 (one million and 00/100 US dollars). For the purposes of aspects related to this type of investigation, the Audit Committee will perform the function of decision-making body, without prejudice to its other functions or powers, as regulated in its Regulations and in the "Complaints Handling Procedure".

### D. RESOURCES.

The resources of the Compliance area are proposed annually by the Compliance Officer, taking as their main reference the [Corporate Compliance Program](#) and the annual objectives of the Compliance area, reflected in the Annual Plan of Compliance Activities.

### e. CORPORATE COMPLIANCE PROGRAM (PREVENTION MODEL).

The Buenaventura Group's Corporate Compliance Program is subject to continuous improvement and has been designed based on our periodic risk assessments, our [Code of Ethics and Good Conduct](#), the [commitments](#) detailed in this Policy and the national and international regulations applicable to us.

Thus, our Corporate Compliance Program goes beyond being a system focused on the prevention of unethical, illicit conduct or those that violate the principles and values of ethical behavior established by the company, also focusing on the mitigation and remediation of such conduct, principles and values. The main elements of our Corporate Compliance Program are as follows:

- 1. Senior Management Commitment:** Buenaventura Group's senior management actively supports and promotes the Corporate Compliance Program, establishing the importance of the corporate compliance culture at the group level.
- 2. Code of Ethics and Good Conduct, Policies and Procedures:** Our Code, policies and procedures are regularly updated and clearly and accessible set out corporate compliance expectations at the group level.
- 3. Dissemination and Compliance Activities:** We effectively communicate progress and achievements in compliance, and we have an Annual Program of Corporate Compliance Activities focused on making our Collaborators aware of compliance policies and procedures, as well as the specific risks of their work area, training them and promoting awareness of the importance of corporate compliance.



- 4. Business Partner Management:** We have a comprehensive and uniform evaluation process of all our [Business Partners](#), with the aim of ensuring that they share our culture of ethics and integrity in business, comply with the applicable legal requirements (SPLAFT, FCPA, OFAC, among others), and ensure the proper application of our internal controls and processes.
- 5. Periodic Risk Assessment:** We conduct periodic risk assessments to identify the areas of greatest risk facing the Buenaventura Group. This allows us to improve our processes, allocate resources optimally and prioritize our attention to the most critical risk areas.
- 6. Continuous Monitoring and Improvements:** We have implemented systems and mechanisms for monitoring, evaluations, reviews and internal audits to supervise adequate compliance with our commitments, legal obligations, policies and processes, as well as detecting possible violations. We have internal processes in place to address any violations effectively or make changes as needed to address new regulations or introduce improvements based on experience gained.
- 7. Trusted Whistleblowing Mechanism:** Our [Collaborators](#) and [Business Partners](#) have a confidential, independently operated channel to report compliance concerns without fear of retaliation. All complaints are dealt with on an individual basis based on clear guidelines and processes that ensure their proper evaluation and resolution.
- 8. Legal and Regulatory Compliance:** Our Corporate Compliance Program satisfies the requirements of Act 30424, its amendments and its Regulations, as well as the requirements of the FCPA and the U.S. Judgment guidelines, among other legal and regulatory requirements.
- 9. Disciplinary Actions and Consequences:** We set clear consequences for corporate compliance violations, ranging from warnings to more severe disciplinary actions, depending on the severity of the violation.
- 10. Compliance Function:** Our Compliance area maintains operational independence, has its own managerial rank and has adequate resources. Its main focus is to ensure the proper observance of each of the corporate compliance commitments detailed in this Policy, in the Corporate Compliance Program, in the System for the Prevention of Money Laundering and Financing of Terrorism, highlighting the importance of respecting the pillars of the [Code of Ethics and Good Conduct](#) of the Buenaventura Group and to comply with all relevant national and foreign regulations.





#### IV. MANUALS, POLICIES & OTHER DOCUMENTS.

This Policy refers to the following manuals, procedures and documents linked to this document:

1. [Code of Ethics and Good Conduct.](#)
2. [Manual for Authorization of Expenditures \("AOEs"\) related to Social Supports, Charitable Contributions, Donations, Sponsorships.](#)
3. [Due Diligence Process Manual.](#)
4. [Manual of the System for the Prevention of Money Laundering and Financing of Terrorism \("SPLAFT"\).](#)
5. [Corporate Personal Data Protection Policy.](#)
6. [Internal Work Regulations \("RIT"\).](#)

#### V. DEFINITIONS.

The terms that appear in capital letters and in blue in this Policy contain links that lead to their definition in this document:

1. [Something of Value](#)
2. [Risk Analysis](#)
3. [Social Supports, Charitable Contributions, Donations and Sponsorships](#)
4. [Ultimate Beneficiary](#)
5. [Reporting Channels](#)
6. [Collaborators](#)
7. [Ethics Committee](#)
8. [Incident Committee](#)
9. [Audit Committee](#)
10. [Compliance Digital Platform](#)
11. [Commitments](#)
12. [Supplier Platform](#)
13. [Corporate Compliance Program](#)
14. [Government Interactions Protocol](#)
15. [Business Partners](#)



For printed versions of this Policy, the terms that appear in capital letters and in blue have "live" links that lead to their definition in this document. Below are references to the page numbers where the defined terms are found:

<b><u>CONCEPT:</u></b>	<b><u>PAGE WITH THE DEFINITION:</u></b>
Something of Value	11
Risk analysis	33
Social Supports, Charitable Contributions, Donations and Sponsorships	9
Ultimate Beneficiary	11
Reporting Channels	29
Collaborators	22
Ethics Committee	36
Incident Committee	36
Audit Committee	37
Compliance Digital Platform	18
Commitments	2
Supplier Platform	17
Corporate Compliance Program	37
Government Interactions Protocol	14
Business Partners	16