

# CODE OF CONDUCT

---

**FOR SUPPLIERS,  
CONTRACTORS, AND  
RELEVANT BUSINESS  
PARTNERS**

---

**AMERICAS MINING  
CORPORATION**

## Index

---

<b>02. Purpose</b>	Pg. 1
<b>03. Scope</b>	Pg. 2
<b>04. International Standards</b>	Pg. 3
<b>05. Code</b>	Pg. 5
5.1. Obligations and Prohibitions	Pg. 5
5.2. Implementation and Monitoring of Obligations	Pg. 11
5.3. Training	Pg. 12
5.4. Communication	Pg. 12
5.5. Whistleblower Hotline	Pg. 12
<b>06. Exhibit 1</b>	Pg. 13
<b>07. Glossary</b>	Pg. 14
<b>08. Sanctions</b>	Pg. 15
<b>09. Review Policy</b>	Pg. 16

At Americas Mining Corporation, we are aware that reputation is based not only on our people's behavior, but also on the behavior of all those with whom we interact, including our Suppliers, Contractors, Business Partners, and Relevant Business Partners, who are a natural extension of the impact and image of our organization.

By incorporating them through this Code of Conduct, we aim to improve the living and working conditions of people along our supply chain, thus contributing to the 2030 Agenda, and achieving the Sustainable Development Goals (SDGs) set by the United Nations.

This Code of Conduct ("the Code") sets out Americas Mining Corporation's (AMC) responsibilities and expectations regarding the ethical and responsible business practices we expect from our Suppliers, Contractors, Business Partners, and Relevant Business Partners, so that they are properly informed, shared and integrated into their own value chain.

This **Code of Ethics** is mandatory for AMC and its Subsidiaries. We are committed to only maintain a business relationship with Suppliers, Contractors, Business Partners, and/or Relevant Business Partners that manage their business with integrity, values, and philosophy similar to those of our company. Therefore, adherence to and compliance with this Code is mandatory, regardless of their own Codes of Ethics.

This Code is consistent with our Code of Ethics, our General Human Rights Policy; our General Sustainable Development Policy; our Environmental Policy; our Community Development Policy; our Occupational Health and Safety Policy; and our Corporate Strategic Sourcing Policy.

**It is also based on the following international standards:**

- The Extractive Industries Transparency Initiative (EITI)<sup>1</sup>.
- International Finance Corporation (IFC) Performance Standards<sup>2</sup>.
- International Labor Organization (ILO) Minimum Age Convention 138<sup>3</sup>.
- ILO Convention 182 on the Worst Forms of Child Labor<sup>4</sup>.
- ILO Convention 29 on Forced Labor<sup>5</sup>.
- ILO Convention 105 on the Abolition of Forced Labor<sup>6</sup>.
- ILO Convention 111 on Discrimination (Employment and Occupation)<sup>7</sup>.
- ILO Convention 100 on Equal Remuneration<sup>8</sup>.
- ILO Convention 169 on Indigenous and Tribal Peoples<sup>9</sup>.
- ILO Convention 87 on Freedom of Association and Protection of the Right to Organize<sup>10</sup>.
- ILO Convention 98 on the Right to Organize and Collective Bargaining<sup>11</sup>.
- ISO 14001:2015 Environmental Management Systems - Requirements with Guidance for Use<sup>12</sup>.
- ISO 45001 :2018 Occupational Safety and Health Management Systems - Requirements with Guidance for Use<sup>13</sup>.

---

<sup>1</sup><https://eiti.org/es>

<sup>2</sup>[https://www.ifc.org/wps/wcm/connect/9dec8c24-bb31-4917-ac73-3766b1d29a8/PS1\\_Spanish\\_2012.pdf?MOD=AJPERES&CVID=k5LngeZ](https://www.ifc.org/wps/wcm/connect/9dec8c24-bb31-4917-ac73-3766b1d29a8/PS1_Spanish_2012.pdf?MOD=AJPERES&CVID=k5LngeZ)

<sup>3</sup>[https://www.ilo.org/dyn/normlex/es/f?p=NORMLEXPUB:12100:0::NO::P12100\\_INSTRUMENT\\_ID:312283](https://www.ilo.org/dyn/normlex/es/f?p=NORMLEXPUB:12100:0::NO::P12100_INSTRUMENT_ID:312283)

<sup>4</sup>[https://www.ilo.org/dyn/normlex/es/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C182](https://www.ilo.org/dyn/normlex/es/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C182)

<sup>5</sup>[https://www.ilo.org/dyn/normlex/es/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C029](https://www.ilo.org/dyn/normlex/es/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C029)

<sup>6</sup>[https://www.ilo.org/dyn/normlex/es/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C105](https://www.ilo.org/dyn/normlex/es/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C105)

<sup>7</sup>[https://www.ilo.org/dyn/normlex/es/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C111](https://www.ilo.org/dyn/normlex/es/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C111)

<sup>8</sup>[https://www.ilo.org/dyn/normlex/es/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C100](https://www.ilo.org/dyn/normlex/es/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C100)

<sup>9</sup>[https://www.ilo.org/wcrnsp5/groups/publici/---americas/---ro-lima/documents/publication/wcms\\_345065.pdf](https://www.ilo.org/wcrnsp5/groups/publici/---americas/---ro-lima/documents/publication/wcms_345065.pdf)

<sup>10</sup>[https://www.ilo.org/dyn/normlex/es/f?p=NORMLEXPUB:12100:0::NO::P12100\\_INSTRUMENT\\_ID:312232](https://www.ilo.org/dyn/normlex/es/f?p=NORMLEXPUB:12100:0::NO::P12100_INSTRUMENT_ID:312232)

<sup>11</sup>[https://www.ilo.org/dyn/normlex/es/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C098](https://www.ilo.org/dyn/normlex/es/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C098)

<sup>12</sup><https://www.iso.org/obp/ui#iso:std:iso:14001:ed-3:v1:es>

<sup>13</sup><https://www.iso.org/obp/ui/#iso:std:iso:45001:ed-1:v1:es>

## International Standards

---

- Due Diligence Guidance for Responsible Minerals Supply Chains in Conflict-Affected or High-Risk Areas of the Organisation for Economic Co-operation and Development (OECD)<sup>14</sup>.
- United Nations Sustainable Development Goals (SDGs)<sup>15</sup>.
- United Nations 2030 Agenda for Sustainable Development<sup>16</sup>.
- OHSAS 18001:2007 Occupational Health and Safety Management System<sup>17</sup>.
- ICMM (International Council on Mining and Metals) Mining Principles<sup>18</sup>.
- Global Reporting Initiative (GRI)<sup>19</sup>.
- Greenhouse Gas Protocol (World Resources Institute)<sup>20</sup>.
- United Nations Guiding Principles. Human Rights in Business<sup>21</sup>, and
- Voluntary Principles on Security and Human Rights<sup>22</sup>; and
- The recommendations of the TCFD (Task Force on Climate-related Financial Disclosures)<sup>23</sup>.

---

<sup>14</sup> [https://www.gob.mx/cms/uploads/attachment/file/650191/Debida\\_diligencia\\_sector\\_extractivo.pdf](https://www.gob.mx/cms/uploads/attachment/file/650191/Debida_diligencia_sector_extractivo.pdf)

<sup>15</sup> <https://www.un.org/sustainabledevelopment/es/objetivos-de-desarrollo-sostenible/>

<sup>16</sup> <https://www.un.org/sustainabledevelopment/es/objetivos-de-desarrollo-sostenible/development-agenda/>

<sup>17</sup> [http://www.itlp.edu.mx/sia/Normas/OHSAS\\_18001.pdf](http://www.itlp.edu.mx/sia/Normas/OHSAS_18001.pdf)

<sup>18</sup> <https://www.icmm.com/principios-mineros>

<sup>19</sup> <https://certifications.controlunion.com/es/about-us/our-approach>

<sup>20</sup> <https://www.wri.org/initiatives/greenhouse-gas-protocol>

<sup>21</sup> <https://www.cndh.org.mx/sites/all/doc/cartillas/2015-2016/35-DH-Empresas.pdf>

<sup>22</sup> [https://media.business-humanrights.org/media/documents/files/documents/Gu%C3%ADa\\_ICMM-CICR-IFC-IPIECA\\_VPSHR.pdf](https://media.business-humanrights.org/media/documents/files/documents/Gu%C3%ADa_ICMM-CICR-IFC-IPIECA_VPSHR.pdf)

<sup>23</sup> <https://www.spglobal.com/marketintelligence/en/campaigns/i-need-to-alian-with-tcfd>

## 5.1. Obligations and Prohibitions

---

### Human Rights

Our Suppliers, Contractors, Business Partners, and Relevant Business Partners must respect the fundamental human rights of all employees, treating them with dignity, respect, and fairness. Illegal or inhumane labor practices, including slavery and human trafficking, are not acceptable.

Our Suppliers, Contractors, Business Partners, and Relevant Business Partners must implement the UN Guiding Principles on Business and Human Rights in their activities, both with their employees and with the third parties with which they interact and their value chain.

For more information, please refer to our General Human Rights Policy.

### Non-Discrimination and Respect for Diversity

Our Suppliers, Contractors, Business Partners, and Relevant Business Partners must support the implementation of a culture free of harassment and discrimination, as well as create a work environment respectful of the diversity of their employees and the surrounding community. Abuse, intimidation, and/or violence should not be tolerated.

For more information, please refer to the AMC Code of Ethics and/or SCC (as applicable), and the AMC Diversity, Inclusion, Non-Discrimination, Non-Harassment, Non-Sexual Harassment, and Non-Mobbing Policy.

### Relationship with Communities

Our Suppliers, Contractors, Business Partners, and Relevant Business Partners must live sustainably with their communities, providing timely information to their stakeholders; promoting projects that benefit the communities around them; being an ally of local communities and governments in emergency situations; and being respectful of their cultural practices.

For more information, please see our Community Development Policy.

### Indigenous Communities

In areas where indigenous peoples or communities are found, our Suppliers, Contractors, Business Partners, and Relevant Business Partners must treat them with respect and recognize their rights to preserve the elements that constitute their culture and identity, and their special connection to the environment.

Also, they must respect the exercise of the right to self-determination of indigenous peoples and communities and actively collaborate with governments in matters of free, prior, and informed consultation, in accordance with the regulatory framework in force in each country.

For more information, please see our General Policy on Respect for the Rights of Indigenous Peoples and Communities.

### Child Labor

Our Suppliers, Contractors, Business Partners, and Relevant Business Partners must refrain from supporting or using any form of child labor. This obligation will be included in contractual clauses in business contracts, either directly or by reference to this Code.

For further information, please refer to the AMC and/or SCC Code of Ethics (as applicable).

## Code

---

### Forced Labor

Our Suppliers, Contractors, Business Partners, and Relevant Business Partners shall implement measures to prevent any form of forced labor and involvement in human trafficking and ensure that all work is performed on a voluntary basis. This obligation shall be included in contractual clauses in business contracts, either directly or by reference to this Code.

For further information, please refer to the AMC and/or SCC Code of Ethics (as applicable).

### Freedom of Association and Freedom to Join a Union

Our Suppliers, Contractors, Business Partners, and Relevant Business Partners must respect the right of association of their employees, as well as the freedom to join a union and to participate in union activities, as established in the current and applicable regulations.

For further information, please refer to the AMC and/or SCC Code of Ethics (as applicable).

### Working Hours

Our Suppliers, Contractors, Business Partners, and Relevant Business Partners must respect employees' normal working hours and overtime, ensuring that overtime is voluntary and in accordance with local legislation, and provide annual leave in accordance with applicable laws. We will include this obligation in contractual clauses in commercial contracts, either directly or by reference to this Code.

### Remuneration

Our Suppliers, Contractors, Business Partners, and Relevant Business Partners must pay wages that equal or exceed the national minimum wage where it exists under local law; the appropriate industry wage (if higher); or a "living wage" that can cover the minimum needs of the worker and his or her family.

### Occupational Health and Safety

Our Suppliers, Contractors, Business Partners, and Relevant Business Partners must provide their workers with a safe and healthy working environment, ensuring compliance with applicable regulations, as well as providing them with adequate occupational health and safety conditions and implementing appropriate measures to prevent occupational injuries and accidents.

They must also provide adequate and sufficient training to their workers to minimize risks, in addition to providing them with adequate and well-maintained personal, and work protection equipment.

They must also take the necessary actions to ensure that the products or services they supply meet the quality and safety criteria specified in the contract.

For more information, see the Occupational Health and Safety Policy.

### Environment

Our Suppliers, Contractors, Business Partners, and Relevant Business Partners must comply with current environmental regulations in the applicable jurisdiction, and commit to using natural resources responsibly, with a preventive and long-term sustainability approach.

In terms of environmental impact, we invite them to establish and maintain processes to improve their environmental performance and mitigate their environmental impacts and risks.

In terms of emissions, we invite them to make efforts to minimize their Greenhouse Gas (GHG) emissions in line with the Paris Agreement (which limits global warming to 1.5 degrees by achieving a global carbon neutral target by 2050), as well as to increase their use of renewable energy, and continuously improve their energy efficiency.



In terms of energy consumption and GHG emissions Scope 1 and 2, we encourage them to monitor and document their emissions. AMC may request this information from them.

Regarding waste and recycling, we encourage them to establish and maintain processes to minimize and recycle waste in their activities.

---

**In terms of water care, we encourage them to implement measures to continuously increase their percentage of recycling and reuse water, as well as to continuously improve the efficiency of water consumption and management, always respecting the water rights of other users from the watersheds where their facilities are located.**

Regarding biodiversity, we invite them to contribute to the protection and conservation of biodiversity in the places where they carry out their activities and to avoid the degradation of ecosystems.

For more information, please see our Environmental Policy.

### **Risk Management**

Our Suppliers, Contractors, Business Partners, and Relevant Business Partners must fully comply with the emergency response plans applicable to them in accordance with their activity.

We encourage them to identify, assess, mitigate, and monitor the risks associated with their activity and within their value chain.

For more information, please refer to the AMC Corporate Risk Management and Control Policy.

### **Transparency and Disclosure**

Transparency promotes accountability and allows third parties to understand and evaluate a company's performance and impacts.

We invite our Suppliers, Contractors, Business Partners, and Relevant Business Partners to report annually on their Environmental, Social and Governance (ESG) performance in line with internationally recognized standards, and publicly support the implementation of the Extractive Industries Transparency Initiative (EITI), which establishes a commitment to disclose information along the extractive industries value chain, from how extractive rights are granted, to how revenues reach governments and how they benefit the population.

### **Regulatory Compliance**

Our Suppliers, Contractors, Business Partners, and Relevant Business Partners must act in compliance with the laws, rules, and regulations in force and applicable in the jurisdictions where they carry out their activities and/or business transactions.

### **Integrity**

Our Suppliers, Contractors, Business Partners, and Relevant Business Partners must conduct business with integrity and demonstrate the highest business ethics. They must not engage in bribery or Corrupt Conduct, whether in their dealings with government officials or officials in the private sector, by establishing appropriate internal controls and keeping accurate books and records.

For more information, please refer to the AMC and/or SCC Code of Ethics (as applicable).

## Code

---

### Anti-Corruption

In principle, AMC and its subsidiaries have no ties with companies or individuals who have been convicted of criminal activities related to Corrupt Conduct. Similarly, our Suppliers, Contractors, Business Partners, and Relevant Business Partners must not maintain links with companies or individuals who have been convicted of criminal activities related to Corrupt Conduct.

Prior to the assignment and during the term of the contract, AMC and its subsidiaries will conduct a background check (screening); the nature and extent of the bribery risk of the individual or legal entity will be assessed; and if applicable, the Due Diligence procedure will be carried out. AMC and its subsidiaries reserve the right to decide the categories of Suppliers, Contractors, Business Partners, and Relevant Business Partners for which it is deemed unnecessary, unjustified, or disproportionate to conduct Due Diligence.

The objective of Due Diligence on certain transactions, activities, individuals, or companies, is to assess the scope, scale, and nature of the risk of Corrupt Conduct. Also, to act as an additional specific control in the prevention and detection of the risk, and to inform the decision of AMC and/or its subsidiaries on the advisability of postponing, suspending, or reviewing those transactions or relationships.

As a result of the Due Diligence procedure, it will be determined whether to initiate or continue the relationship, as well as the need to implement controls; establish ad hoc clauses in the respective contract and, where appropriate, the use of service level agreements.

When deemed appropriate, based on the results of the risk assessment, the Due Diligence will be updated periodically so that changes and new information can be considered.

AMC and its subsidiaries are not obliged to verify full compliance with the obligations. However, we will take reasonable steps to ensure that they are being complied with (e.g., by requesting copies of documents, etc.).

We encourage our Suppliers, Contractors, Business Partners, and Relevant Business Partners to implement financial and non-financial controls and Due Diligence procedures to assess the risk of corruption in their value chain.

For more information, please refer to the AMC Corporate Anti-Corruption Policy: as well as the AMC Supplier and Contractor Code of Conduct.

### Prevention of Money Laundering and Terrorist Financing

Our Suppliers, Contractors, Business Partners, and Relevant Business Partners must comply with the applicable regulations in force regarding the prevention of Money Laundering and Terrorist Financing in the jurisdictions where they carry out activities. This obligation shall be included in contractual clauses within commercial contracts, either directly or by reference to this Code.

AMC and its subsidiaries have no links with companies or individuals who have been convicted of criminal activities related to money laundering and terrorist financing.

Prior to the assignment and during the term of the contract, the individuals or companies will be monitored in anti-money laundering lists and relevant sanctions (Screening); the nature and extent of the risk of money laundering and terrorist financing will be assessed; and if applicable, the Due Diligence procedure will be enforced. AMC and its subsidiaries reserve the right to decide the categories for which Due Diligence is deemed unnecessary, unjustified, or disproportionate.

Our Suppliers, Contractors, Business Partners, and Relevant Business Partners are required to implement Due Diligence procedures to assess the AML/CFT risk of both their employees and related third parties, and their value chain.

For more information, please refer to AMC's Corporate Policy on Prevention of Money Laundering and Terrorist Financing.

### **Conflict of Interest**

Our Suppliers, Contractors, Business Partners, and Relevant Business Partners must know and understand the duty to avoid any Conflict of Interest, real, apparent or potential, directly or indirectly related to their work, relationships, activities, or business.

For more information, please refer to the AMC Corporate Policy on Conflicts of Interest.

### **Business Relationships**

We invite all our Suppliers, Contractors, Business Partners, and Relevant Business Partners to implement responsible business practices, to become certified and to undergo independent assessments.

### **Business Competition**

We encourage all our Suppliers, Contractors, Business Partners, and Relevant Business Partners to comply with applicable antitrust laws, regulations, and other standards in the countries in which they conduct business.

For more information, please refer to the AMC Corporate Antitrust Policy.

### **Taxes, duties, and royalties**

Our Suppliers, Contractors, Business Partners, and Relevant Business Partners must comply with their obligations to pay taxes, duties, and royalties derived from their commercial, export, and activities of mineral exploitation and use. We encourage them to comply with the Extractive Industries Transparency Initiative (EITI).

### **Confidential, privileged information, and personal data privacy**

Our Suppliers, Contractors, Business Partners, and Relevant Business Partners must use confidential information obtained in their relationship with AMC and/or its subsidiaries only for authorized business purposes and to conduct their activities.

Confidential information must not be used for personal/family benefit or advantage, directly or indirectly, or for the benefit of third parties. Nor to buy or sell securities or to disclose to third parties' information for the purpose of buying or selling securities.

Also, the privacy of personal data from employees, suppliers, customers, and candidates to fill a vacancy, and any other interested party, with respect to whom personal data is processed in accordance with the provisions of the applicable legislation in each case, must be protected by establishing controls to prevent unauthorized or illegal use, destruction, or loss of the data.

For more information, please refer to the AMC and/or SCC Code of Ethics (as applicable), as well as the AMC Corporate Data Privacy Policy.

### **Mineral Supply Chains**

Our Suppliers, Contractors, Business Partners, and Relevant Business Partners must take necessary actions to identify, assess and manage risk in their supply chains.

We encourage our Suppliers, Contractors, Business Partners, and Relevant Business Partners to implement Due Diligence procedures in their mineral supply chains as an ongoing, proactive, and reactive process, through which they ensure respect for human rights and non-contribution to conflict, as well as respect for international law and compliance with national laws (including those regulating illicit trade in minerals) and the United Nations.

## Code

---

The Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, including Annex II, should be used for this purpose:

### **Serious abuses related to the extraction, transport, or trade of minerals:**

They must not tolerate or profit from, or act to contribute to, assist or facilitate, anyone committing any form of torture or cruel, inhuman, or degrading treatment; any form of forced labor; the worst forms of child labor; gross violations of human rights, and/or war crimes, or other serious violations of international humanitarian law, like crimes against humanity or genocide.

When we identify a reasonable risk of serious abuse, we will immediately discontinue our interaction with the individual or legal entity. This obligation will be included in contractual clauses within commercial contracts, either directly or by reference to this Code.

### **Direct or indirect support to non-state armed groups:**

No direct or indirect support to non-state armed groups from the extraction, transportation, trade, handling, or export of minerals should be tolerated. Our Suppliers, Contractors, Business Partners, and Relevant Business Partners must refrain from any actions that contribute to the financing of conflict. When we identify a reasonable risk associated with someone providing direct or indirect support to those groups, we will immediately suspend our interaction with them. This obligation will be included in contractual clauses within commercial contracts, either directly or by reference to this Code.

### **Public or private security forces:**

We must not directly or indirectly support public or private security forces that illegally control mining sites, transportation routes, and supply chain actors; illegally collect taxes or extort in exchange for money or minerals at access points to mining sites, along transportation routes or at points where minerals are traded, or illegally collect taxes, or extort from intermediaries, export companies, or international traders.

The role of public or private security forces at mining sites, and/or in the vicinity, and/or along transportation routes should be limited solely to maintaining the rule of law, including protecting human rights, providing security for mine workers, their equipment, and facilities, as well as protecting mining sites or transportation routes from interference affecting legitimate extraction and trade activities.

Where public or private security forces are engaged in their supply chain, their obligation to act in accordance with the Voluntary Principles on Security and Human Rights should be established.

Individuals or security forces with a known history of serious human rights violations should not be contracted.

The contracts that regulate the relationship between AMC and its Subsidiaries will establish the suspension or termination of our interactions, when the need to implement mitigation measures is detected from the risk assessment, and they are not carried out within the established term.

### **Bribery and fraudulent declaration of the mineral's origin:**

Bribes must not be offered, promised, given, or demanded. Requests for bribes that aim to conceal or falsify the origin of minerals to fraudulently declare taxes, sums, and royalties paid to governments in accordance with the purposes of extraction, trade, handling, transportation, and export of minerals should be rejected.

The contracts that regulate the relationship between AMC and its Subsidiaries will establish the suspension or termination of our interactions, when the need to implement mitigation measures is detected from the risk assessment, and they are not carried out within the established term.

**Money Laundering:**

Efforts should be adopted and/or measures taken to contribute to the effective elimination of money laundering, when a reasonable risk of money laundering is identified as a result of, or related to, the extraction, marketing, handling, transport, or export of minerals derived from the illegal collection of taxes or extortion for minerals at access points to mining sites, along transport routes, or at points where minerals are traded.

The contracts that regulate the relationship between AMC and its Subsidiaries will establish the suspension or termination of our interactions, when the need to implement mitigation measures is detected from the risk assessment, and they are not carried out within the established term.

## 5.2. Implementation and Monitoring of Obligations

---

The obligations and prohibitions in this Code of Conduct will be incorporated by reference, or otherwise applied in all contracts between AMC and its subsidiaries and our Suppliers, Contractors, Business Partners, and/or Relevant Business Partners.

---

### **Our Suppliers, Contractors, Business Partners, and/or Relevant Business Partners agree to cooperate fully with any investigations that may be conducted to verify compliance with this Code.**

It is their responsibility to demonstrate compliance with this Code, or compliance with comparable standards and obligations contained in their own Code of Ethics. To this end, they are expected to apply a system of management oversight and controls related to compliance with the obligations set forth in this Code, proportionally and in accordance with applicable industry standards, and considering the size, complexity, and risk exposure.

Suppliers, Contractors, Business Partners, and Relevant Business Partners must keep sufficient documentation to demonstrate compliance with this Code and respond to requests for information by AMC and/or its subsidiaries within the period granted for it. Monitoring of obligations will be carried out according to their risk classification.

AMC and its subsidiaries reserve the right to request information and documentation to verify compliance with the provisions of this Code. We also reserve the right to request corrective measures, and even to terminate the contractual relationship when non-compliance with the provisions of this Code is found.

## Code

---

### 5.3. Training

---

AMC and/or its subsidiaries will notify in writing to its Suppliers, Contractors, Business Partners, and Relevant Business Partners how it will support their training to properly address risk assessment and due diligence procedures.

### 5.4. Communication

---

Our Suppliers, Contractors, Business Partners, and Relevant Business Partners shall communicate the obligations arising from this Code within their value chain.

### 5.5. Whistleblower Hotline

---

When a Supplier, Contractor, Business Partner, or Relevant Business Partner has sufficient evidence to consider that an obligation established in this Code has not been complied with, they may use the Integral Whistleblower System (SID, for its acronym in Spanish) to report it, which is the confidential and secure means to report and raise concerns or complaints about conduct that goes against the provisions of our internal regulations, as well as our values and standards:

#### **MINERA MEXICO**

Website: <https://gmm.lineadedenuncia.net>

E-mail: [gmm@lineadedenuncia.net](mailto:gmm@lineadedenuncia.net)

Phone: 800 10 88 869

#### **ASARCO**

Website: <https://asarco.lineadedenuncia.net>

E-mail: [asarco@lineadedenuncia.net](mailto:asarco@lineadedenuncia.net)

Phone: 1 800 961 6771

#### **SPCC**

Website: <https://spcc.lineadedenuncia.net>

E-mail: [spcc@lineadedenuncia.net](mailto:spcc@lineadedenuncia.net)

Phone: 080078258

If it is not possible to go to the SID, they may confidentially submit their concerns by contacting the Compliance Officer in each jurisdiction.

**Initial and Annual Compliance Confirmation**

By virtue of this document, the Supplier, Contractor, Business Partner, or Relevant Business Partner hereby declares that it complies with all obligations set forth in the Code of Conduct for Suppliers, Contractors, and Relevant Business Partners, including but not limited to the following:

- 1) Declares to be duly constituted in accordance with the laws of its country of origin and to be duly authorized to provide its services in favor of AMC.
- 2) Have a tax identification (tax ID) in accordance with their contracted activities.
- 3) Be fully identified (have a duly accredited address and location data).
- 4) Comply with the obligations set forth herein at all times.

The Supplier, Contractor, Commercial Partner, or Business Partner must provide us with an annual update for the following information:

- a) Articles of Incorporation - (Certificate of Incorporation).
- b) Power of attorney of the legal representative.
- c) Official identification of the legal representative.
- d) Proof of address not older than two months.
- e) Proof of registration with the tax authorities.
- f) List of shareholders that are part of the corporate structure of the company (legal entities).
- g) Sign this code.

Failure to comply with the obligations set forth in this document will result in the sanctions established in this Code of Conduct without any liability for AMC.

Acceptance

I agree and accept the obligations arising from this Code.

\_\_\_\_\_

Name and Signature of Legal Representative

Date:

**Serious Abuse**

- i) Any form of torture or cruel, inhuman, or degrading treatment;
- ii) any form of forced labor,
- iii) the worst forms of child labor;
- iv) other serious violations of human rights and abuses like widespread sexual violence;
- v) war crimes or other serious violations of international humanitarian law, crimes against humanity, or genocide.

**Conflict and High-Risk Areas**

Conflict and high-risk areas are characterized by the presence of armed conflict, widespread violence, or other risks that may cause harm to people. Armed conflict can take a variety of forms, like a conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation, insurgencies, civil wars, etc. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure, and widespread violence. These areas are often characterized by widespread human rights abuses, and violations of national or international law.

**Corrupt Conduct**

The following are Corrupt Conduct: Bribery; Extortion, or Instigation of Crime; Traffic of Influences, and Unauthorized Facilitation Payments.

**Contractor**

An individual or company that undertakes, by contract, to execute a work in exchange for an agreed price within a specific period.

**Due Diligence**

Process to assess, in detail, the nature and extent of bribery risk and to assist in making decisions regarding specific transactions, projects, activities, and personnel.

**AMC Subsidiaries**

Southern Copper Corporation (SCC) and its subsidiaries Southern Peru Copper Corporation (SPCC) and Minera Mexico (and their respective subsidiaries); ASARCO Inc. and its subsidiaries; as well as AMC Mining Iberia S.L.U. and Minera Los Frailes.

**Non-State armed groups**

To identify non-state armed groups, the relevant United Nations Security Council resolutions should be consulted.

**Suppliers**

An individual or company that supplies one or more companies with stock (products), which will be sold directly or transformed for further sale.

**Trading or Business Partner**

An external party with which AMC and/or its subsidiaries have, or plan to establish, a business relationship. A Business Partner is an organization, company, or other entity with which AMC and/or its subsidiaries have a direct business relationship. This relationship may include a contractual agreement to produce, buy, or sell a product. They include customers, intermediaries, or local and international traders, and joint venture partners. They do not include end consumers.

**Relevant Business or Trading Partner**

This is any partner whose actions can reasonably be expected to significantly affect the company's business, including suppliers with large volume contracts or who are essential for business continuity, and major customers. The determination in each case will be made in accordance with the risk assessment's results.

**Joint venture partners**

An agreement between several companies to conduct a joint business.



The Ethics and Integrity Committee will receive complaints related to non-compliance with this Code and, if applicable, will forward the information to the appropriate area for investigation.

If the Compliance Officer in each jurisdiction is the one who receives the complaint, it must be formally forwarded to the Ethics and Integrity Committee for processing.

In the case of Third Parties, if it is confirmed that there has been a breach of the provisions of this Code, considering the circumstances in each case, it may: i) instruct a risk mitigation and attention plan or ii) refer to the legal area to take the necessary actions in contractual matters, as well as others that may correspond in accordance with the applicable legislation.

# 09

## Review Policy

---

This Code will be reviewed annually by the Procurement Department, the Engineering and Construction Department, the Sales Department, and the New Business Department at AMC. If changes, updates, or modifications are required, the Internal Control and Compliance areas at AMC will be notified.



---

# CODE OF CONDUCT

---