



SOLEIL
METALS

POLICY AND PROCEDURE

ANTI-BRIBERY AND CORRUPTION

	Compliance				SOLEIL METALS
	P&P ANTI-BRIBERY AND CORRUPTION				
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1. POLICY STATEMENT

The policy applies, within the framework of its corporate social responsibility, to all commercial activities carried out by **SOLEIL METALS SA** and its related companies in Peru, and its employees (hereinafter collectively referred to as "**SOLEIL METALS**").

SOLEIL METALS reaffirms its commitment to unrestricted respect for fundamental labor rights, particularly with a zero-tolerance policy towards illegal and/or criminal activities in any form.

We strive to build and strengthen an ethical culture as an indispensable element for the prevention and detection of corruption; therefore, **SOLEIL METALS** will take the necessary actions to ensure that our employees, activities, and operations are carried out within the bounds of legality.

2. OBJECTIVE

The primary objective of **SOLEIL METALS** is to ensure that all levels of the organization – including senior management, middle management, administrative personnel, and employees at large – adhere to the highest standards of integrity, professionalism, and ethical conduct in the performance of their duties. It is our expectation that their actions consistently reflect and reinforce the company's reputation by fulfilling their responsibilities with honesty, diligence, and a strong sense of accountability.

3. SCOPE

Compliance with this Policy and Procedure (P&P) extends to all operations and activities conducted by the **SOLEIL METALS**. Responsibility for the effective implementation of this P&P lies directly with senior management, operational leadership, and all personnel across the organization. This includes, but is not limited to, employees working at the processing plant, administrative staff, as well as individuals engaged through contractors, subcontractors, and third-party service providers.

4. LEGAL FRAMEWORK

- **D.S. No. 092-2017-PCM.** Approves the National Policy on Integrity and the Fight against Corruption.
- **Law No. 27693. Created the Financial Intelligence Unit - Peru (UIF-Peru),** responsible for receiving, analyzing, processing, evaluating, and transmitting information for the detection of money laundering and terrorist financing.
- **D.S. No. 044-2018-PCM.** Approves the National Integrity and Anti-Corruption Plan 2018-2021, published on 04/26/2018.

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5. PRINCIPLES

SOLEIL METALS and its employees are fully committed to upholding and applying core principles aimed at preventing and combating bribery across all areas of operation. These principles include the following:

- **Strictly prohibit all forms of bribery and/or facilitation payments.** No employee or representative of the company shall induce, or attempt to induce, public or private officials to act unethically for personal or corporate gain.
- **Reject the acceptance of money, gifts, valuables, or any undue advantage** from public or private officials, whether intended to secure personal benefits or to favor the company.
- **Ensure that all employees are provided with and adhere to the applicable Code of Conduct,** in accordance with the internal regulations of the SOLEIL METALS corporate group and in compliance with reporting obligations to the Financial Intelligence Unit of Peru (UIF-Peru).
- **Require criminal, police, and judicial background checks** for all personnel prior to their employment with the company.
- **Forbid the offering or payment of bribes, directly or indirectly,** to gain commercial advantages with suppliers or third parties.
- **Operate in a fair, transparent, and honest manner,** in full compliance with applicable anti-corruption and anti-bribery laws and regulations.
- **Foster and promote ethical behavior among employees,** reinforcing a corporate culture that actively combats corruption and bribery in accordance with current legal frameworks.
- **Maintain accurate and transparent accounting records** that clearly reflect all payments, expenses, transactions, asset use, and financial accountability.
- **Prohibit the practice, encouragement, or tolerance of any act of corruption or bribery,** whether direct or indirect, personal or on behalf of third parties, across all organizational operations.
- **Establish and implement internal procedures and controls** to prevent, detect, and sanction any potential incidents of corruption and bribery, ensuring the confidentiality of all reports and communications received.
- **Communicate and disseminate this policy and relevant legislation** across the organization.

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All members of **SOLEIL METALS** express their full commitment to the principles outlined in this policy. With the active support of senior management, this policy will be effectively communicated to all organizational levels, suppliers, contractors, and visitors, and will be made available to all interested parties. It will be reviewed and updated as necessary to ensure its ongoing relevance and effectiveness.

Prepared by:	Reviewed by:	Approved by:
		
Human Resources Department Compliance Department	Director of Operations	SOLEIL METALS Board of Directors
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Date: 1 oct 2025	Date:	Date:

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APPENDIX: 1

FLOWCHART OF THE ANTI-CORRUPTION POLICY PROCEDURE



The Head of Human Resources, Mining Operations Manager, and Compliance Officer are responsible for the prevention and enforcement of the policy and Code of Conduct.



Enforce the Anti-Corruption Policy and Code of Conduct in Crime Prevention (identify, assess, respond, monitor, report).



Implement reporting channels (email, telephone, PQRS mailbox, and others).



Train the entire organization on the existence and application of the Anti-Corruption Policy and Code of Conduct.



Monitor compliance with the Anti-Corruption Policy and the code of conduct implemented.