



# **SOLEIL METALS**

**POLICY AND PROCEDURE**

**FREEDOM OF ASSOCIATION**

|                                                                                   |                            |                 |                   |            |                  |
|-----------------------------------------------------------------------------------|----------------------------|-----------------|-------------------|------------|------------------|
|  | SOCIAL POLICY              |                 |                   |            | SOLEIL<br>METALS |
|                                                                                   | FREEDOM OF ASSOCIATION P&P |                 |                   |            |                  |
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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 workers (hereinafter collectively referred to as "**SOLEIL METALS**").

**SOLEIL METALS** reaffirms its commitment to unrestricted respect for fundamental labor rights, particularly the right to protect the rights of its workers to do so, even if this is not directly in its interest. If there is no recognized and active union in the operator's jurisdiction, if unions are prohibited by law, or if unions are managed by the government and not by their members, the mining organization will allow workers to democratically choose a form of independent worker organization.

## 2. OBJECTIVE

The main objective within the framework of this Policy and Procedure is to maintain a stable, conflict-free, and healthy work environment. To recognize and respect the rights of its workers to associate, assemble, and organize legally and peacefully in accordance with National Legislation.

## 3. SCOPE

Compliance with this policy and procedure covers all activities of **SOLEIL METALS**. Senior management, operational management, and all other members of the various areas are directly responsible for the implementation of this P&P, including workers at the processing plant, administrative staff, and workers employed by contractors, subcontractors, and third-party services.

## 4. LEGAL FRAMEWORK

- According to ILO Convention 154, Art. 2
- Ministerial Resolution No. 322-2009-TR
- 1993 Political Constitution of Peru.

## 5. PRINCIPLES

**SOLEIL METALS** and its employees recognize and apply the fundamental principles based on freedom of association and collective bargaining<sup>1</sup>. In order to comply with this policy, the following actions must be taken:

- Recognize and respect the right of employees to freedom of association and collective bargaining<sup>2</sup>.
- Provide the conditions for workers to organize and associate legally and peacefully in order to address labor issues and matters of interest within the workplace.

<sup>1</sup> 1993 Constitution of Peru, Art. 28

<sup>2</sup> According to ILO Convention 154, Art. 2

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- Do not act against workers who wish to exercise, participate, or not participate in an association or collective bargaining.
- No reprisals, suspensions, dismissals, or any sanctions affecting the payment of workers' wages shall be taken.
- Delegate to the representative the responsibility of being the primary point of contact with the workers' association.
- Actively collaborate and participate in the search for solutions.

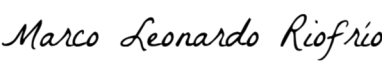
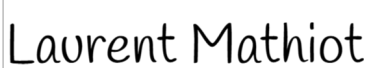
## 6. PROCEDURES

**SOLEIL METALS** management and human resources are responsible for implementing this Procedure, complying with the following guidelines:

- Management, the board of directors, and the human resources department shall be responsible for ensuring that this policy is communicated, implemented, and monitored. The purpose of this is to follow up on any violations of this policy.
- Implement a PQRS mailbox. Any worker who has experienced or witnessed an act of discrimination for exercising freedom of association with any organization has the possibility of reporting such a situation to their immediate supervisor or the human resources department.
- Implement non-discriminatory policies and procedures regarding union organization, union membership, and activity in areas such as job applications and decisions on promotions, dismissals, or transfers.
- Implementation of recreational environments for use by company personnel.

Finally, all of us who work at **SOLEIL METALS** express our commitment to comply with the statements contained in this policy. With the support of senior management, this policy will be disseminated to all levels of the organization, suppliers, contractors, and visitors, and will also be available to all interested parties. It will be updated as necessary.

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| Prepared by:                                                                                                    | Reviewed by:                                                                                                     | Approved by:                                                                                                                                                                                                                                                                                                                                                 |
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| Date:<br>3 oct 2025                                                                                             | Date:<br>3 oct 2025                                                                                              | Date:<br>9 oct. 2025                                                                                                                                                                                                                                                                                                                                         |