



**PROHIBITION OF CHILD LABOR
POLICY AND PROCEDURE**

	SOCIAL POLICY				SOLEIL METALS
	P&P - PROHIBITION OF CHILD LABOR				
	AREA:	HUMAN RESOURCES	VERSION: DATE:	16/092025	
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1. POLICY STATEMENT

SOLEIL METALS expresses its firm commitment to the prevention and eradication of child labor, in full compliance with national legislation and international conventions ratified by the Peruvian State.

SOLEIL METALS acknowledges that child labor infringes upon the fundamental rights of children and adolescents, and represents a severe violation of their dignity, health, safety, as well as their physical, mental, and emotional development. Consequently, **SOLEIL METALS** has implemented a zero-tolerance policy toward all forms of child labor throughout our entire value chain.

2. OBJECTIVE

Establish and formalize guidelines and procedures that guarantee the prevention, identification, control, and eradication of child labor in all of **SOLEIL METALS'** operations, including **SOLEIL METALS'** contractors, subcontractors, suppliers, and strategic partners, in compliance with national regulations and the principles of the Global Compact, ILO.

3. SCOPE

The policy applies to all commercial activities conducted by **SOLEIL METALS SA** and its related companies in Peru, as well as to their employees (hereinafter collectively designated as "**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

- Political Constitution of Peru.
- Law No. 27337 – Code on Children and Adolescents.
- D.S. No. 003-2010-MIMDES – Regulations on Permitted Adolescent Work.
- ILO Convention No. 138 – Minimum age for admission to employment.
- ILO Convention No. 182 – Worst Forms of Child Labor.
- Law No. 28806 – General Law on Labor Inspection.
- Principles of the United Nations Global Compact.

5. PRINCIPLES

SOLEIL METALS recognizes and applies the fundamental principles based on the eradication of child labor and the guidelines detailed below:

- **Prohibit the employment of minors under 18 in any project activities that involve potential risks to health and physical integrity.** This policy applies to contractors, suppliers, business partners, and any other parties involved in the company's operations.

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- **Implement appropriate and reliable mechanisms to verify the minimum age of hired personnel.** These mechanisms may include hiring procedures, ID verification, RENIEC checks, and other relevant methods.
- **Promote and educate on the prevention and elimination of child labor,** ensuring the protection of legally employed minor workers in accordance with D.S. No. 003-2010-MINEDU, and in coordination with the relevant authorities.
- **Maintain accurate and up-to-date records of all workers** to ensure compliance and transparency.
- **Conduct rigorous documentary verification of age for all employees and third-party personnel** to ensure full adherence to age-related regulations.
- **Provide continuous training and awareness programs** for workers and contractors to reinforce the importance of child labor prevention.
- **Cooperate with relevant authorities** to report and eliminate any detected instances of child labor.
- **Ensure the communication and dissemination of this policy,** along with applicable laws and regulations regarding the prevention and eradication of child labor.
- **Review and update the policy as necessary** to reflect any changes in legislation or company practices.

6. PROCEDURES

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

6.1. In Direct Hiring

- **State in the Internal Work Regulations that the minimum hiring age is 18 years.**
- **Verify the age of applicants using their original ID card, a RENIEC database check, or other official verification methods.**
- **Include the following documents in the admission checklist:** a copy of the ID card, the admission form, the employment contract, and registration in the T-Registro.
- **File all supporting documentation in the employee's personnel file** for record-keeping and compliance.
- **Require applicants to sign an affidavit confirming the accuracy of their personal information.**

6.2 In the supply chain

- **Include a clause in all service agreements and purchase orders** requiring strict compliance with this policy.
- **Request and review the personnel lists of contractors, subcontractors, and suppliers** to ensure compliance with age-related regulations.
- **Conduct random checks and internal audits** to verify the age of third-party personnel and ensure ongoing compliance.

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- **Take immediate corrective actions** if any non-compliance is detected, ensuring prompt resolution.

6.3 In cases of detection or suspicion

- **Activate the internal response protocol** immediately upon detecting a potential violation.
- **Report the incident to the Ethics and Compliance Committee** for review and further action.
- **Document and record the incident** thoroughly for transparency and accountability.
- **Coordinate with relevant authorities** (MTPE, DEMUNA, Prosecutor's Office) to ensure comprehensive attention and remediation of the situation.
- **Ensure no retaliation against whistleblowers** who report in good faith, protecting their rights and confidentiality.

7. DISSEMINATION AND TRAINING

This policy will be continuously communicated to all workers, contractors, visitors, and suppliers to ensure widespread awareness.

Mandatory annual trainings on child labor prevention will be provided to all relevant parties.

Awareness will be further reinforced through visual materials, presentations, induction sessions, and digital media.

8. MONITORING AND UPDATE

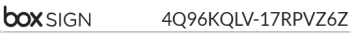
Human Resources Management and the Compliance Department will oversee and ensure effective implementation of this policy.

The Policy and Procedure (P&P) will be reviewed annually and updated as needed to align with any regulatory or contractual changes. Updates will be communicated to all staff and stakeholders.

9. FINAL STATEMENT

All employees, strategic partners, and third parties interacting with SOLEIL METALS are required to comply with the content and principles of this policy, in alignment with the group's ethical, legal, and sustainability commitments.

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