



**PROHIBITION OF FORCED LABOR
POLICY AND PROCEDURE**

	SOCIAL POLICY				SOLEIL METALS
	P&P ON THE PROHIBITION OF FORCED LABOR				
	AREA:	HUMAN RESOURCES	VERSION: DATE:	22/092025	
	CODE:	P&P-GH-002-V0-2025	PAGE:	5	

1. POLICY STATEMENT

The policy applies, within the framework of their corporate social responsibility, to all commercial activities conducted by **SOLEIL METALS SA** and its related companies in Peru as well as to their employees (here-after collectively designated as “**SOLEIL METALS**”).

SOLEIL METALS reaffirms its commitment to the unrestricted respect for fundamental labor rights, particularly the prevention and eradication of any form of forced or compulsory labor, in accordance with applicable national and international standards.

According to the International Labor Organization (ILO), forced labor is defined as "any work or service exacted from a person under the threat of punishment and for which that person has not offered himself or herself voluntarily" (Convention No. 29).

2. OBJECTIVE:

To establish institutional guidelines that enable:

- The prevention of forced labor in all its forms
- The prompt detection of any situation that poses a risk of labor coercion; and immediate, corrective action in response to any indication of a violation.

3. SCOPE:

Compliance with this policy and procedure covers all activities conducted by legal entities owned by **SOLEIL METALS** or related to **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. APPLICABLE LEGAL FRAMEWORK

- Constitution of Peru, Article 23 (prohibits forced labor).
- Law No. 29783 - Occupational Safety and Health Law and its regulations.
- Peruvian Penal Code, Article 168-B (defines the crime of forced labor).
- ILO Convention No. 29 on forced labor.
- ILO Convention No. 105 on the abolition of forced labor.
- Law No. 28950 - Law against human trafficking and the smuggling of migrants.
- Supreme Decree No. 019-2006-TR - Regulations of the General Law on Labor Inspection.

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5. PRINCIPLES.

SOLEIL METALS recognizes and applies the principles of fundamental rights detailed below:

- **Respecting the voluntary nature of our employees' work by preventing and eradicating all forms of forced labor**, in full compliance with relevant national and international laws and regulations.
- **Rejecting the use of any form of forced or compulsory labor**, as defined in ILO Convention No. 29, including the practice of "confiscating money or identity documents at the start of the employment relationship to retain workers against their will.
- **Respecting freedom of association and collective bargaining**, recognizing the right of employees to form or join organizations that defend and promote their interests, and refraining from interfering with their choices in this regard.
- **Ensuring the dissemination and awareness of this policy**, along with relevant legislation concerning the prevention and prohibition of forced labor.
- **Updating the policy as deemed necessary** to maintain compliance and effectiveness.

6. PREVENTION PROCEDURES

The General Management and the Human Resources Department will be responsible for implementing and supervising this procedure, under the following guidelines:

6.1 Verification and documentation of the employment relationship

- Validation of employment contracts, complete files, and voluntarily signed documents.
- Ensuring that there is no undue pressure in the signing of contracts or attached documents.

6.2 Coercion-free environment

- Continuous supervision of the work environment to ensure the absence of threats, harassment, intimidation, or undue restrictions.
- Regular assessments of the work environment and confidential channels for reporting complaints.

6.3 Adequate working conditions

- Provision and monitoring of the use of Personal Protective Equipment (PPE), in accordance with job-related risks.
- Guidance on IPERC, risk mapping, and safety signage within the plant and office areas

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6.4 Compliance with labor rights

- Timely payment in accordance with the law of remuneration, social benefits, CTS, bonuses, overtime, and breaks.
- Formal recording of arrivals and departures using biometric clocks, in accordance with the agreed working hours.

6.5 Document management

- Custody of labor documentation in the Human Resources department, ensuring confidentiality and traceability
- 6.6 Training and awareness.
- Annual talks, workshops, and training sessions on forced labor, labor rights, and reporting protocols.

7. REPORTING AND ACTION MECHANISMS

Confidential and secure communication channels will be set up for reporting any form of coercion or evidence of forced labor.

The company will ensure that no reprisals are taken against individuals who report in good faith.

An immediate internal investigation will be conducted, and appropriate corrective or legal action will be taken.

8. DISSEMINATION AND UPDATING

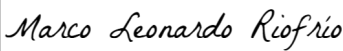
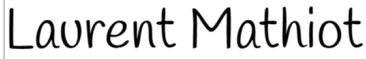
This policy will be:

- Communicated to all internal and external personnel through induction, posters, and institutional emails.
- Included in service contracts with suppliers and contractors.
- Reviewed and updated at least annually, or whenever there is a relevant regulatory change.

9. FINAL STATEMENT

SOLEIL METALS reaffirms its unwavering commitment to the compliance with human and labor rights, maintaining a firm zero-tolerance policy toward forced labor. Senior management leads the effort to ensure compliance across all levels of the organization.

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