



**POLICY ON THE PREVENTION OF  
MONEY LAUNDERING AND  
TERRORIST FINANCING**

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|  | POLICY                         |            |                |             | SOLEIL METALS |
|                                                                                   | PREVENTION OF MONEY LAUNDERING |            |                |             |               |
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## 1. Introduction

Law No. 27693, published on April 12, 2002, established the Financial Intelligence Unit of Peru (UIF-Peru). UIF-Peru is responsible for receiving, analyzing, processing, evaluating, and disseminating information related to the detection of money laundering (ML) and terrorist financing (TF). It also plays a key role in supporting the implementation of systems to prevent and detect suspicious transactions.

Money laundering and terrorist financing are illicit activities that aim to give a veneer of legitimacy to unlawfully obtained assets or to channel funds towards terrorist operations. Combating these crimes is a high priority for the Peruvian government and society as a whole.

Money laundering is classified as a criminal offense in Peru. It involves converting or transferring assets with the intent to conceal or disguise their illegal origin, as well as hiding the nature, source, location, destination, movement, or ownership of such assets.

Terrorist financing is a separate crime, in which assets – sometimes of legal origin – are used by criminal organizations to fund terrorist acts.

These types of crimes pose a serious threat to the reputation of **SOLEIL METALS** and its parent company, **OCIM**, potentially compromising their operational stability and financial sustainability. As such, it is crucial to identify transactions that may originate from illegitimate sources or that aim to conceal or finance criminal activity.

**SOLEIL METALS** companies are subsidiaries of the **OCIM Group**, based in Switzerland. They are involved in mineral processing at two plants located in southern Peru and in the gold trading business. These operations carry inherent risks related to illegal mining, which is often linked to money laundering.

To carry out its operations in Peru, **SOLEIL METALS** has established several subsidiaries, some of which are registered with the Registry of Gold Traders and Producers (RECPO). At the corporate level, **SOLEIL METALS** acknowledges the challenges in fully preventing its operations from being misused, even unknowingly, as a conduit for financial crimes. Nevertheless, the company is committed to implementing policies and procedures that minimize risk and to supporting authorities in the fight against money laundering, terrorist financing, and illegal mining.

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Furthermore, under current Peruvian regulations, mining companies are classified as Regulated Entities within the scope of the National Policy and Action Plan for Combating Money Laundering and Terrorist Financing. As such, **SOLEIL METALS** is under the regulatory oversight of UIF-Peru.

## 2. Objective

This Policy outlines **SOLEIL METALS'** commitment to the prevention of Money Laundering (ML) and Terrorist Financing (TF), in accordance with applicable Peruvian legislation, including Law No. 27693, Law No. 30424, and the guidelines issued by the SBS and UIF-Peru.

The Money Laundering and Terrorist Financing Prevention Policy (hereinafter referred to as the "Manual") applies to **SOLEIL METALS**, its subsidiaries, and related entities operating in Peru (collectively referred to as "**SOLEIL METALS**"). It provides employees with clear guidelines to be followed in the course of their duties, to ensure that the company's operations are not used—intentionally or unintentionally—for criminal purposes.

Detailed operational procedures and requirements are included in the company's Money Laundering and Terrorist Financing Prevention Manual.

## 3. Scope

This Manual is mandatory and applies to all employees of **SOLEIL METALS**, including the Compliance Officer, senior management, key personnel, and representatives, where applicable.

## 4. Principles

- **Regulatory Compliance:** Strict adherence to AML/CFT (SPLAFT) regulations issued by the SBS and UIF-Peru.
- **Due Diligence:** Implementation of robust Know Your Customer (KYC) and Customer Due Diligence (CDD) procedures.
- **Monitoring and Reporting:** Identification and reporting of unusual or suspicious transactions to UIF-Peru.
- **Training:** Ongoing training programs on ML/TF prevention for all personnel.

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- Confidentiality: Protection of sensitive information, especially in relation to Suspicious Transaction Reports (STRs).

## 5. Roles and Responsibilities

- Compliance Officer: Responsible for implementing, overseeing, and updating the AML/CFT program and for reporting to UIF-Peru.
- Senior Management: Approves this Policy and ensures that sufficient resources are allocated for its implementation.
- Employees: Required to follow internal procedures and report any suspicious activity or transactions.

## 6. Sanctions

Non-compliance with this Policy may result in internal disciplinary action. Additionally, administrative, civil, and/or criminal penalties may apply under Peruvian law.

## 7. Review

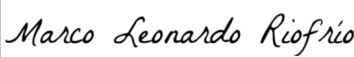
This Policy will be reviewed and updated at least annually or whenever regulatory changes are introduced by SBS, UIF-Peru, or relevant international bodies (e.g., FATF/GAFI).

## 8. Statement

**SOLEIL METALS** reaffirms its commitment to upholding the highest standards of integrity and compliance in preventing money laundering and terrorist financing in Peru.

If you'd like, I can also help format this into a professional document (with headings, logo placeholders, etc.), or translate it back into French or Spanish if needed.

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| Prepared by:                                                                                                    | Reviewed by:                                                                                                     | Approved by:                                                                                                                                                                                                                                                                                                                                                |
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| Head of Compliance                                                                                              | Director of Operations                                                                                           | SOLEIL METALS Directory                                                                                                                                                                                                                                                                                                                                     |
| PEZO, Oscar                                                                                                     | LEONARDO RIOFRIO, Marco                                                                                          | MATHIOT, Laurent<br>SALAS GARCIA, Ivan<br>DENTROUX, Maxime                                                                                                                                                                                                                                                                                                  |
| Date:<br>1 oct 2025                                                                                             | Date:<br>3 oct 2025                                                                                              | Date:<br>9 oct. 2025                                                                                                                                                                                                                                                                                                                                        |