

Corporate Policies

Sustainability is a strategic pillar of the Molymet Group.

Molymet is committed to manage its operations in a sustainable way, in accordance with their corporate policies.

Corporate Policy on the Environment

"Molymet is specialized in the processing of molybdenum and other metals. It is fully committed to expanding its preventative measures for controlling and minimizing the environmental impact of its operations, in line with current environmental legislation and other voluntary agreements.

The Company will maintain an Environmental Management System based on the techniques of continuous improvement in order to guarantee care for the environment during current operations and any future investment projects.

John Graell M.

Chief Executive Officer CEO"

Corporate Policy on Sustainability

Molymet S.A. is committed to managing its operations in a sustainable way, ensuring operational continuity based on the highest standards of quality, the control of environmental risks, the safety of personnel, and full respect for current legislation.

John Graell M.

Chief Executive Officer CEO

Corporate Policy on Suppliers

"Building alliances with the members of the supply chain brings added value to our processes and products, making them part of our management systems at Molymet. Selection of these suppliers aims at those who share our commitment to ethics, sustainable development and respect for labor rights. We give preference to local businesses, ascribing to the practices of fair trade and promoting economic sustainability over time.

John Graell M.
Chief Executive Officer CEO"

Corporate Policy on Relations with Stakeholders

"Transparency, permanent dialogue and ethical conduct are highly valued by Molymet when establishing long-term relations of trust with our different stakeholders.

Ensuring fluid communication with all these groups is a constant challenge for the company. This also includes developing effective and appropriate communication channels, while taking into account the specific nature of the group in question and the interest of the company in publicizing its sustainability.

John Graell M.
Chief Executive Officer CEO"

Corporate Policy on Quality

"The way in which the quality, production, commercialization and administration of Molymet is managed focuses on operational excellence and on satisfying our clients' needs over the long-term.

In order to achieve this, every part of the Company is committed to quality and to constantly improving the efficiency, productivity and reliability of our processes through the application and development of our Quality Management System.

John Graell M.
Chief Executive Officer CEO "

Corporate Policy on Organizational Values and Principles of Action

Organizational Value

Molymet and its subsidiaries have, as their purpose, that all activities are carried out, registered and monitored in accordance with a strict observance of the laws, policies, standards and procedures applicable, and in that regard, the staff should choose the path of the highest degree of integrity.

Ethical Behavior Values

As a result, the company considers it essential that, in the exercise of their functions, staff observes the following values of ethical behavior:

1.- The staff of the Company may not use their relationship with the company or confidential information obtained as a result of this relationship, for their personal benefit, or of any member of their family group or third parties.

Also, they may not, directly or indirectly, sell or lease, to the company, any kind of property, facilities, equipment, mineral resources, products or services.

2. The staff of the Company shall not, directly or indirectly, have any participation or receive benefits, services, profits or payment from any company or individual who has or is trying to obtain business dealings with Molytmet or any of its subsidiaries.

This does not imply that the employee, their spouse and/or members of their family group may not invest in securities of publicly traded companies, even when they are related to Molytmet or any of its subsidiaries.

In the event that an employee has the absolute need for the services, for a particular purpose, of any company or individual that has or is trying to obtain business dealings with Molytmet or any of its subsidiaries, the employee shall report this fact to the Corporate Manager of Human Resources and Corporate Internal Auditor of Molytmet, indicating the nature of the service, the cost and the support of the corresponding payment.

3. An employee may not approve or control contracts or other business activities between the Company and a direct member of their family group or with a company or individual in which a member of their immediate family has a decision responsibility. The review, approval or administrative control of these businesses, invoices or vouchers shall be sent to upper senior management.

4. An employee of the Company shall not, unless Molytmet has required and authorized so, disclose to third parties any confidential data or information concerning the businesses of Molytmet or any of its subsidiaries.

5. An employee of the company will not be able to use, for their particular benefit; information, staff, facilities, equipment, supplies or commercial relationships of Molytmet or any of its subsidiaries.

6. An employee may not render services as an executive or as a consultant for any company or individual sharing, doing business or trying to do business with Molytmet or any of its subsidiaries.

7. All applications developed, or the way in which an application is to be used in the Company, including, specifically, the software, network and communication equipment, security devices, computer programs, manuals, formulas, variables of calculation, business rules, source codes, designs and documentation, is the intellectual property of Molytmet and constitutes "confidential information" to be used only within the Company, therefore it should not be copied, reproduced or distributed totally or partially.

8. The employee must maintain, in complete reserve, everything that reaches their knowledge directly or indirectly, either due to their functions or by correspondence, contracts, accounting books or reports on business, industrial activities, methods of preparation or any operation of

the Company, regardless of its nature.

9. The staff of the Company shall not, directly or indirectly, accept invitations or gifts from customers and suppliers. Exceptionally, in order not to incur in discourtesy to them, accept gifts of low amounts may be accepted, for example during Christmas. However, such must be reported in writing to a superior, either Executive President, Vice President, Manager or Deputy Manager of the unit, in order to caution that the acceptance does not result in deterioration to the image, objectivity and impartiality of the Company.

A low amount gift is considered to be that which has a commercial value not exceeding three (3) U.F.

9.1 For the case of public employees, the delivery or reception of gifts is expressly forbidden, regardless of amount, in order to fully comply with la 20,393.

Exceptions

Exceptions to this Policy must be analyzed and recommended by the Vice President, Manager or Deputy Manager of the relevant unit, approved by Corporate Management Office of Human Resources and finally authorized by the Executive Presidency. Said exceptions must be established in writing and copies must be registered in the Personal Folder of the Employee involved.

Based on these values, we have declared the following Principles of Action:

1. **We promote free competition.** We do not accept violations to the current legislation. We comply with the laws, both internal as well as international affecting the business.
2. **We have integrity in our business.** Zero Tolerance to corruption and poor commercial practices.
3. **We promote the principle of sustainability.** We do not accept risk to health of persons or the environment.
4. **We drive equality of opportunities in commercial transactions.** We say no to the use of insider information in the stock exchange.
5. **We do not accept falsehood, simulation or deception,** in the registration of accounting information, reflected in our financial statements.
6. **We do not accept discrimination** and we promote just working conditions and equality of opportunity.
7. **We protect the results of our efforts and respect** legally acknowledge rights of third parties.
8. **We separate corporate interests from personal interests** to prevent conflicts of interest.

Contractual Annex

The hereby Policy is an integral part of the individual working agreement.

Board of Directors

The hereby Policy is applicable to the members of the Board of Directors of the Corporation. Possible conflicts of interest shall be submitted to the knowledge of the Board of Directors in its next meeting.

Force of the Modification

The hereby modification will come into effect in March 5th, 2013.

John Graell M.
Chief Executive Officer CEO

Corporate Policy on Occupational Health and Safety

"Molymet is committed to the health of its workers and to complying with the most rigorous safety standards.

Part of the growth of the company involves maintaining a proactive attitude to risk in the workplace and the safety of our surroundings, together with continuous improvement of our Occupational Health and Safety Management System, which focuses on preventing, investigating, resolving and correcting any issues. This also represents a contribution to the quality of life of the people in the company and the members of the local communities.

John Graell M.
Chief Executive Officer CEO"

Corporate Policy on Energy

"Molymet is fully committed to the rational and efficient use of energy. For this reason we are developing and implementing programs based on the principles of continuous improvement, aimed at identifying, evaluating and controlling the use of different forms of energy.

John Graell M.
Chief Executive Officer CEO"

Corporate Policy on Community Relations

"Molymet's approach to the community is based on building relationships of trust and respect for the interests of its local communities, taking into account their values and culture.

We promote activities and programs with the aim of encouraging local development, participating in the local community on the creation of proposals that look to satisfy their interests and needs for growth.

John Graell M.
Chief Executive Officer CEO "