



Code of Conduct

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Code of Conduct

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1 A Word from our Chief Executive Officer and Vicepresident

A word about Integrity from our CEO



"Today we face a more demanding regulatory environment, with regulations such as the Economic Crimes Act and the Karin Law, which underscore the need to act with transparency, respect, and responsibility across all areas. These are challenges that must be embraced with conviction and seen as an opportunity to continue raising our standards."

Dear colleagues,

At Molymet, our values not only define who we are but also guide how we act. Ethics, integrity, and compliance with our policies and procedures are essential pillars in building a trustworthy, sustainable, and environmentally respectful organization.

This Code of Conduct sets forth the principles that guide our daily actions. Compliance is not just an individual responsibility, but a collective commitment that strengthens our corporate culture and safeguards our reputation.

Today, we face a more demanding regulatory environment, with regulations such as the Economic Crimes Act and the Karin Law, which reinforce the need to act with transparency, respect, and responsibility in all areas. These are challenges that must be embraced with conviction and seen as opportunities to continue raising our standards.

The sustainable development we promote in each of our actions also requires care for the environment, the well-being of people, and an unwavering commitment to human rights. Only through these principles can we project our legacy with pride and consistency.

On this path, whistleblowing channels play a fundamental role. They are a safe and confidential tool to raise concerns about situations that may go against our principles. Their responsible use is key to our continuous improvement as an organization.

I encourage you to learn about, respect, and apply this Code in every decision you make. We rely on everyone's commitment to building a workplace that is ethical, fair, and aligned with the highest standards of conduct.

We trust you to continue making Molymet a company we can all be proud of.

Edgar Pape
CEO



Claudia Avendaño, words from our Corporate Vicepresident of Compliance and Risk



1. A WORD FOR OUR
CHIEF EXECUTIVE
OFFICER AND VICE
PRESIDENT

Molymet have always been concerned about the Integrity and ethical environment of their activities. The latter is reflected in the actions of their employees and the continuity of our legacy as a company.

This Code of Conduct is a compilation of all central values and principles defined in our internal policies, being a tool that allows us to declare a behavioral guide assisting professional work and decision making.

In these times, it is of great importance to define our internal guidelines and culture. Therefore, the implementation of the code is a strategic milestone, which is a fundamental part of the interaction within our teams, providing the framework and tools for situations that affect daily work. The role of Supervisors is essential since they are the first channel of conversation in irregularity detection in this Code of Conduct. If this is not possible, we have the ethics hotline, an anonymous and externally managed channel, which allows us to guarantee confidentiality in these situations.

I invite you to remain aware and attentive to any situation we see that is not in line with our code, bearing in mind that our behavior, whether by action or omission, must always be aligned with what is established by our Company.

I am confident that all Molymet's employees will continue having a collaborative, responsible, and ethical attitude when faced with situations of non-compliance.

We are counting on you.





2 Organizational Vision

This Code of Conduct aims to declare the ethical principles in the organization's foundation. We want an inspiring business culture, focusing on the rules our employees must follow.

This document is also based on agreements and commitments acquired internationally with different organizations that ensure ethics, safety, respect, rights, and sustainability.

This code sets out rules that define our employee's actions and presents a guide that causes us to generate relationships with the highest ethical standards and promote the best practices in everything carried out in Molymet.



Purpose

Molymet aims to we generate value for the evolution of humanity through products developed by people who believe in the wellbeing of our planet.



Organizational Values and Business Principles

Our Company is focused and aligned with its purpose, values, and principles in each short, medium, and long-term initiative that allows the materialization of our goals. Every person who is part of and relates to Molymet is committed to echoing a spirit of legal compliance and sustainability.



Values of Molymet

Integrity

We act consistently with what we say and think. We act ethically. We keep our word. We act with righteousness, truthfulness, and transparency. We promote a tolerant relationship without discrimination. We know that respect is the basis of solid interpersonal and business relationships.

Excellence

We obtain superior results. We seek maximum efficiency in our processes. We take charge of our work with responsibility and commitment, and we always meet our objectives. We focus our work on continuously improving our productivity, efficiency, and cost indexes. We are committed. We take charge of our work with responsibility.

Transcendence

We generate value over time. We understand our commitment to society. We are committed to the professional development of the people who make up our teams. We actively support the communities to which we belong. We collaborate and provide effective solutions to our customers. Our legacy will be the present of future generations.

Sustainability

Safety always comes first: zero accidents is our motto. We promote and maintain the highest safety standards. We take care of people. We comply with and exceed current regulations, thus generating trust. We minimize the environmental impact of our operations. We respect our natural and social surroundings.

Confidentiality

We ensure the safekeeping and confidentiality of information. We know that our business information is one of our main assets. We make responsible use of the Company's knowledge.

Innovation

We are committed to innovation. We are at the forefront of new technologies. We focus on obtaining new and better products. We believe in research and the permanent development of new solutions to contribute positively to the changes in our environment and the market.



Business Principles

As expressed in the Policy on Organizational Values and Business Principles, which is the essence and guide for all operations and processes of the entire business, the roadmap of this code is relevant because:



1. Promotes and only accepts free competition, intending to go beyond national and international regulations in its compliance.



2. Integrity is the foundation of our Company and day-to-day operations. Corruption and bad business practices will never be accepted.



3. Sustainability is integrated into the essence of our Company. We always take care of all our internal and external shareholders.



4. It is not allowed to use privileged information for personal gain, violating equal market opportunities.



5. Molymet works with a long-term view, always attentive to the impact of the actions of all employees without neglecting external stakeholders.



6. It promotes the transparency and truthfulness of shared corporate information and avoids any conflict of interest.



7. Diversity and non-discrimination are promoted, where equity and meritocracy are central.



Subscription to international agreements

Molymet adheres to the Universal Declaration of Human Rights of 1948, directly complemented by the Guiding Principles on Business and Human Rights of 2011, both of the United Nations. In addition, it watches over the Fundamental Rights in Labor Relations and Environment and fights against corruption.

Likewise, we subscribe to the 17 Sustainable Development Goals, selecting some of them according to the impact of our operations and Corporate Sustainability Strategy.

We align ourselves with the declarations of the International Labor Organization, mainly through the Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy and the Declaration on Fundamental Principles and Rights at Work.

We respect and comply with local laws and customs where our subsidiaries are located.

Since 2009 we have had a certified Crime Prevention Model, which addresses the requirements and recommendations described in Law 20.393 on Criminal Liability of Legal Entities. Other compliance aspects also complement this prevention model to maintain an integral vision, such as ethical values and Integrity.





3 General Description

Molymet needs to maintain the highest standards of Integrity during all interactions with stakeholders. That means complying with laws, policies(*), standards, guidelines, and procedures in all countries where we operate.

(*) The terms "policy," "principles," "instruction," and "guideline" refer interchangeably to internal normative documents containing general principles, which may or may not be approved by the Board of Directors, as applicable. Therefore, any reference to "policies" in this document should be understood in a generic sense, regardless of the official name in force in each case.

Objective

To guide, provide concrete guidelines, and reinforce the organizational culture concerning ethics and integrity at Molymet.

Reach

This Code of Conduct considers all the people who are part of Molymet its employees, and its various stakeholders, communities, suppliers, contractors, authorities, and customers.



Report situations that go against our values

Molymet urges employees to report misconduct or ethical violations, using various tools and resources created especially for this purpose. In case of questions or doubts, or if it is necessary to report a violation of the Code of Conduct, it should be communicated in the first instance to the direct management. If there is no opportunity to speak to the immediate Supervisor, or if there has been no satisfactory response, guidance should be sought from the Chief Risk Compliance Officer or by entering <https://molymet.ines.cl/molymet/formulario/>, where you will receive instructions on how to file a complaint on the platform.

Molymet is committed to assisting with compliance and ethics reporting. Additional instructions are available in this document on their use and how to proceed.

Molymet reaffirm its strict promise of non-retaliation.

The Code of Conduct provides guidelines and case examples that can help clarify what to do and how to act in circumstances that may be unclear.

Some situations may not be covered in this document, and direct management should be informed when in doubt about how to act.

The Company is always committed to ensuring that people do not act in bad faith, having the conviction that there is a favorable disposition to comply with the Code of Conduct.

Integrity

We must treat customers, suppliers, competitors, and our employees fairly. No one should exploit people or situations through manipulation, concealment, abuse of privileged information, misrepresentation of facts, or other unfair practices.

Protection and non-retaliation

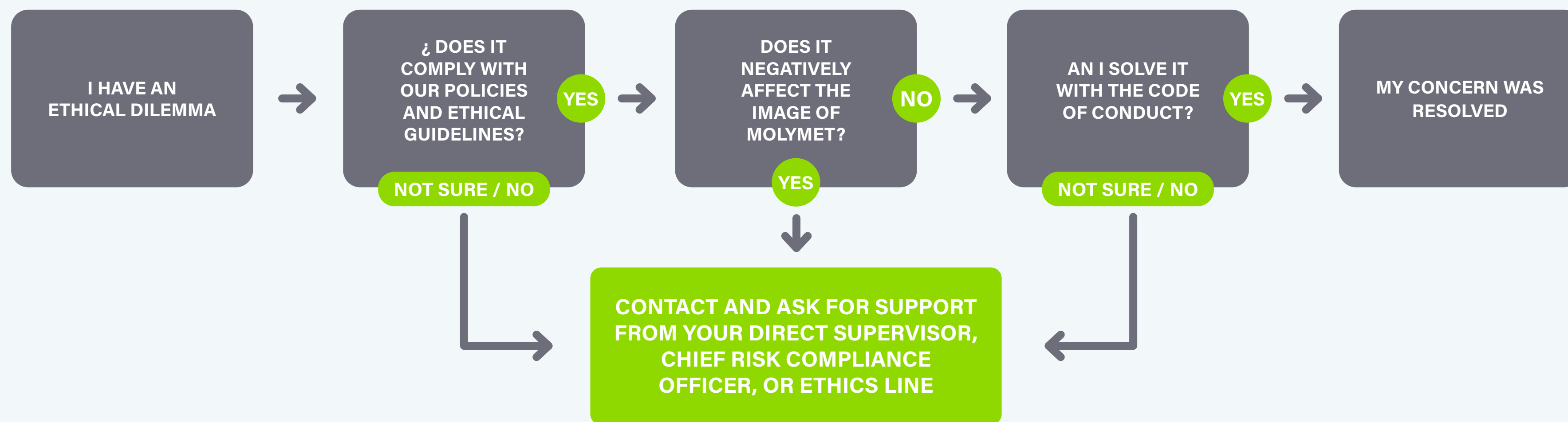
Molymet's reputation for Integrity is a valuable asset. Anyone suspected of violating internal policies or the Code of Conduct must be reported. If any employee believes that they are being retaliated against for following the Code of Conduct or questioned for reporting a violation, they should use the tools or resources outlined in this code to report it immediately. Our Company will not tolerate retaliation against those who uphold the Company's commitment to Integrity.





Evaluation of an ethical issue

The Code of Conduct's purpose is to promote the correct behavior of all Molymet's employees. Any person who believes to be in an ethical dilemma can analyze it in the following way:



Contacts and resources

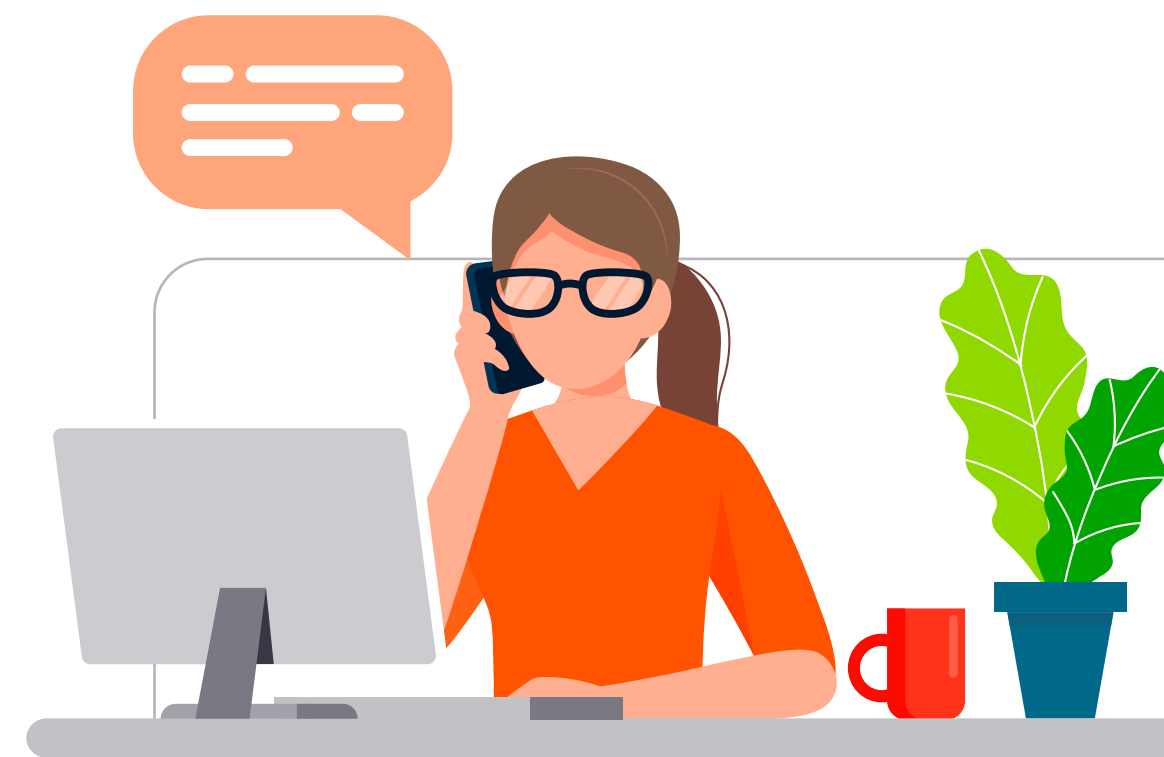
There are different communication channels that the Company provides to all its stakeholders to present an ethical situation or predicament:

- Ethics Line
<https://molymet.ines.cl/molymet/formulario/>



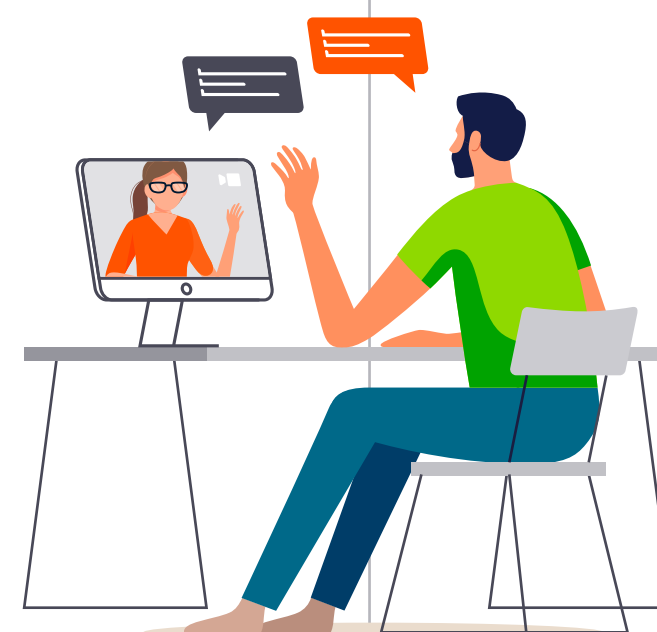
Procedure for reporting ethical issues

We will evaluate each report on Code of Conduct infringements in a confidential, empathetic, transparent, and respectful process.



1 Contact

If you are aware of an ethical situation, please contact the Ethics Line.



2 Reporting

It must be clear, accurate, and truthful, providing everything that is known about this situation in an objective manner.



3 Investigation

We will collect all information available from persons involved in the case. The team responsible for this evaluation process and may be supported by an expert or other persons.



4 Solutions and measures

Considering the scope and investigation of the case, a timely and fair solution will be provided. This can range from a warning meeting, a written and/or verbal reprimand, to the termination of the contract.



4 Subjects covered by the Code of Conduct

- Workplace Harassment
- Sexual Harassment
- Anti - corruption
- Government and Public Authorities
- Climate Change
- Fair Competition
- Internal and External Communications and Social Media
- Conflict of Interest
- Caring for Our Assets and Identity
- Human Rights
- Diversity, Gender Equity, Inclusion, and Non-Discrimination
- Circular Economy
- Copyright
- Gifts
- Respect and Community Contribution
- Environmental Impact and Responsibility
- Information Security
- Health and Safety
- Selecting and relating tu Suppliers and Contractors
- Transparency
- Business Trips
- Corporate Sustainability and Due Diligence



Workplace Harassment

Respecting and taking care of ourselves is part of our hallmark as an organization, so we strictly prohibit any situation or conduct that could be considered harassment at work, aggression, and/or constant harassment by a Supervisor, collaborator, or other work relationship. This position is explicitly stated in our Internal Rules of Order, Health, and Safety. According to the Directorate of Labor, Work place Harassment is:

“Any conduct that constitutes aggression or harassment, exercised by the employer or by one or more workers, against another or others, by any means, resulting in the affected employees being undermined, mistreated, or humiliated. Also, anything that threatens or harms their work situation or employment opportunities provided that it is repetitive behavior.”



We should

- Contribute to and promote a workplace free of harassment, aggression and/or bullying.
- Have empathy and treat each person we interact with at work (Supervisors, teams, or other people) as we would like to be treated ourselves.
- Respect and agree on work times and modalities within and outside the workday to align expectations, actions, and responsibilities.



We should NOT

- Damage the working relationship I have with my peers or Supervisor.
- Remain silent if I feel uncomfortable in a working relationship or if I witness a situation of harassment at work.



Find out more

If you have a question/ concern or want to report an issue related to Workplace Harassment, please get in touch with your Supervisor HR, Senior Management or, Corporate Vice-Presidency of Compliance and Risk.



Tool and resources for more information

Internal Rules of Order,
Health, and Safety.



Workplace Harassment

Case 1

An employee's Supervisor constantly assigns him out-of-hours work, demands better results than his colleagues, and is never satisfied with his work.

What should I do?

Express your concern about this situation with your Supervisor. There may be a misunderstanding, and you should create a new working agreement and establish the expected results.

Case 2

A group of employees constantly make jokes regarding race, religion, and other personal differences. I find some words offensive and am concerned that others feel the same way.

What can I do to help?

Humor has a lot to do with personal taste, and people often make jokes that are not appropriate for the workplace. People may not realize that the subject matter of some of the jokes may insult or demean others. You should talk to the person involved and explain how you feel. If their reaction to your request is adverse, you should speak to your Supervisor. Jokes, verbal comments, gestures, and other topics discussed that embarrass or demean people are detrimental to our work environment.





Sexual Harassment

Because abuse of any kind is against our principles and essence as a company, we will not accept any conduct or situation related to sexual harassment. This is specifically addressed in our Internal Rules of Order, Health, and Safety, where we consider the main situations as sexual harassment:

- **Sexual coercion:** where a superior abuses his power and demands a subordinate to grant some activity or action of a sexual nature so that he can access or maintain some labor benefit.
- **Non-consensual sexual advances:** this is related to sexual invitations or other verbal, non-verbal, and/or physical requests, intending to harass, intimidate, abuse, and limit a person at work, creating a hostile work environment, mainly among peers.
- **Habitual manifestations of sexual harassment** include seeking a work benefit in exchange for sexual favors and intimidation through unwanted behavior by the victim. The use of any term, word, or physical conduct of a sexual nature such as sexual insinuation and/or proposition affecting the victim's dignity and/or any aggressive and hostile reaction resulting from the rejection of the previously mentioned actions.



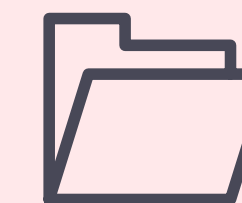
We should

- Contribute and promote a work environment against any sexual harassment.
- Always respect and do not give rise to uncomfortable situations or generate an undesirable reaction from the counterpart.
- Think before acting: a comment or gesture can be taken positively or negatively by each person.
- Relate professionally and respectfully in the workplace.



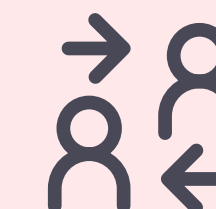
We should NOT

- Engaging in or insisting on any behavior that another person considers inappropriate or undesirable.
- Making provocative comments about people's appearance.



Tools and resources for more information

Internal Rules of Order, Health, and Safety.



Who to contact?

If you have a question/concern or want to report an issue related to Sexual Harassment, please contact your Supervisor, Ethics Line, HR, Senior Management or, Corporate Vicepresident of Compliance and Risk for support.



Sexual Harassment

Case 1

One of my teammates told me that our boss made specific comments that he considered inappropriate during an after-work team meeting. Still, he is hesitant to talk about it because he doesn't want to hurt his career or spread rumors about the situation.

What should you do?

Encourage your colleague to speak directly with their boss and share their disagreement about what happened in the after-work meeting. If the employee has doubts about the response of their superior, you can communicate this to the people area to request guidance or formalize a harassment report. If the affected employee does not want to share what happened, you can report this situation to the Ethics Line.

Case 2

On several occasions, a customer has made affectionate uncomfortable gestures and said that we could reach a better business agreement if I have an appointment with him. Since he is external, I am unsure how to proceed in front of my boss and the Company.

What should I do?

Speak directly to your direct Supervisor, as no one should be harassed.



Anticorruption

We have Integrity in every action we take, so we will not accept and avoid any corruption-related conduct. These can range from fraud, bribery, and bribes to public/private institutions or individuals, assets or money from illegal acts, money laundering, terrorist financing, bribery, cybercrime, or any other crime or practice with these characteristics.

We also have robust management, monitoring, and compliance model for the criminal liability of legal entities to reduce the risks to which Molymet is exposed in this area.

We should

- Report in the event of witnessing or knowing of any situation related to corruption.
- Ensure respect for and compliance with the sworn statements of suppliers, contractors, and customers.
- Conduct annual reviews and improvements to the Crime Prevention Model by an external company.
- To ensure that suppliers, contractors, and customers are aware of and comply with our anti-corruption policies.
- Comply with supplier and contractors' protocols, along with the relationship with clients, before entering into a contract and/or transaction.

We should NOT

- Hiding the illegal origin of any asset, purchase, possession, or use.
- Gifting an object or money to any public or private entity, trade unions, employees, suppliers, contractors, customers, or other person or institution to influence a decision or obtain a benefit for oneself or our Company.
- Maintaining a contract or relationship with a supplier, contractor, or customer, knowing that they have acted corruptly with another entity.



Tools and resources for more information

- Internal Rules of Order, Health, and Safety.
- Crime Prevention Policy.
- Organizational Values and Business Principles Policy.



Anticorruption

Case 1

The media has just reported that a supplier has acted corruptly with other companies in the market.

Should I maintain the contract with this supplier?

Molymet will never relate to any corruption, so contracts must be paused until a legislative ruling is obtained.

Case 2

A client offers to pay a higher price on an invoice and split half of the difference. He tells me that he has done this with other companies.

What should I do?

What the customer is offering is a crime and goes against the Company's values and Integrity, so you should not accept his proposal. Notify this situation to your Supervisor, Senior Management or, Corporate Vice-Presidency of Compliance and Risk or Ethics Line.

Case 3

A contractor offers to pay a commission to a colleague in charge of evaluating quotes for the product he delivers if his Company is awarded the contract.

What should I do?

What the contractor is offering is criminal and goes against the Company's values and Integrity, so he should not accept what the contractor is proposing. Notify your Supervisor, Senior Management or, the Corporate Vicepresident of Compliance and Risk, or the Ethics Line of this situation.



Governmental and Public Authorities

Being transparent and ethical in the public sphere is part of our essence. We establish the Company's relationship and its management with government authorities and/or public officials through our Performance Policy of Molibdenos y Metales S.A. with the public official and the Crime Prevention Policy Law 20.393.

We ensure compliance with related international practices, the legislation on criminal liability of legal entities, and the legal regulations regarding the relationship with government authorities and public officials.

We reject any situation of corruption, bribery, or any other act with similar characteristics or that may constitute a crime related to government authorities and/or public officials, where directors, management, and employees are involved, in addition to all those who act in the name or representation of Molymet.

We should

- To comply with the duties established in the regulations, laws in force, and corporate policies of Molymet.
- Declare any conflict of interest with a government authority and/or national or foreign public official.
- Be alert to any risky situation related to corruption, bribery, bribery with government authorities and/or public officials.
- Record, through a single registration form, every time there is a need to meet and/or interact with a national or foreign public official.
- Communicate to Molymet's Corporate Vice-Presidency of Compliance and Risk every time you meet or interact with a national or foreign public official.



Tools and resources for more information

- Organizational Values Policy and Business Principles.
- Performance Policy of Molibdenos y Metales S.A. with the public official.

We should NOT

- Delivering any payment or support that benefits a government authority and/or national or foreign public official on behalf of the company.
- Accept any direct payment from a government authority and/or national or foreign public official.
- Support or finance political activities on behalf of Molymet with Molymet's resources.



Governmental and Public Authorities

Case 1

A company Supervisor proposes to a group of employees to make a group donation to the electoral political campaign, in the name of our Company, of a particular candidate and political color who, in addition, happens to be his relative.

Can I participate?

This would link Molymet to political campaigns, so this proposal should be rejected. The Company's opinions and positions regarding the national contingency are channeled through the communication channels defined by management.

Case 2

From time to time, a company Supervisor must meet with public officials to fulfill the objective of some jobs that their functions require.

Is this correct?

There are no impediments if the Supervisor needs to meet with public officials to fulfill some of their duties. It is essential to use the single record form for these meetings. This information must be reported monthly to the Corporate Vicepresidency of Compliance and Risk.



Climate Change

Mitigation and action against the effects of climate change is our duty and commitment. This is a fundamental theme in our Corporate Sustainability Strategy.

We consider different actions and procedures over the regulations to anticipate, control, and reduce the impact on our environment.

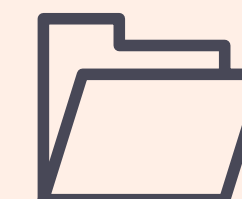
As a result of our essence as an institution, we contribute to the decarbonization of the economy since molybdenum and rhenium are in themselves sustainable materials.

We should

- Consider in each process and operation the risks that may exist about climate change.
- Analyze the continuous improvement of processes and operations to mitigate the effects of climate change.
- Consider global, national, or international climate change objectives in our management.

We should NOT

- Think about a new process, operation, or project without considering or omitting the positive or negative contribution generated to climate change.



Tools and resources for more information

- Corporate Sustainability Policy.
- Corporate Environmental Policy.



Climate Change

Case 1

We are implementing a new project, where I realized that this harms our commitment to mitigate the effects of climate change. However, I am thinking of keeping quiet about it to not damage the project and my professional career.

Is this correct?

Failure to report this situation violates our Code of Conduct and organizational values. Report this situation to your Supervisor or the Corporate Sustainability Management or Ethics Line you perceived to reach a solution together.

Case 2

We are evaluating suppliers to replace engines, choosing the most economical Company, since we must meet our budget goals. However, this selection is the least efficient and will generate higher expenses since the engines consume more energy and generate more CO2 emissions.

Is it appropriate to select this supplier?

Although this Company meets the financial requirements for selection, suppliers should always be analyzed as a whole, considering legal, administrative, social, and sustainable criteria, for example, efficiency and contribution to climate change. Therefore, the supplier with the best evaluation in all criteria should be selected.





Fair Competition

Respect for our competitors is the basis of our business, so we defend free, fair, and sustainable competition, where we will not accept anti-competitive behavior, as indicated in the Unfair Competition Law and the Free Competition Law.

We are always guided by a vision of regulatory compliance in every action we take, considering local and global regulations on this matter.

In addition to this, we will never subscribe to monopolistic pricing practices, abuse of our position, market segmentation, communication of classified information to competitors, and/or improper handling of bids, among others. These may impact the organization and its people in a negative way and/or with legislative sanctions.



We should

- Comply with the duties established in the regulations and laws in force.
- Report any fact related to an anti-competitive practice.
- Avoid any risky situation related to a conflict of interest that goes against fair competition.
- Gather market and competition information from reliable and legal means.
- Omit sales processes that use any illicit means that seek to divert customers from another in the market.
- To generate publicity that avoids any act that affects the reputation of others.



We should NOT

- Interfering in any way in the value chain of competing companies.
- Transmitting Molymet's confidential information to competitors to achieve a benefit of the Company or oneself.
- Receive confidential information from competitors to achieve benefits for Molymet or oneself.
- Abuse our power or position in the market and access to market segmentation.
- Improperly manage the process or result of bids or contracts.
- Influence other stakeholders, such as suppliers, contractors, or customers, against the competition.



Tools and resources for more information

- Organizational Values Policy and Business Principles.



Fair Competition

Case 1

One of our suppliers told us confidential information about the competition, specifically their prices and future projects.

May I use this information?

No Molymet employee may use confidential competitive information, even from a supplier or other stakeholder. You must communicate this situation to your Supervisor, Corporate Vicepresident of Compliance and Risk, or Ethics Line.





Internal and External Communications and Social Media

Communicating clearly with our internal and external stakeholders is fundamental. We take care of our image, reputation, and value as a sustainable organization.

According to each situation and information, each communication action must be fast, clear, and efficient. We must plan our communications. Our internal and external channels exist d to satisfy and comply with our goals.

We will always ensure truthful, ethical, responsible, transparent, and sustainable communication, both in its content and the information's sources.

Concerning our social media sites, we must ensure that what we share does not violate any Molymet policies or rules designed to protect the security of our information, the reputation of our brand, and/or the privacy of our employees.

Similarly, it is important not to disclose any Molymet confidential, proprietary, or private information if using social networking sites for professional purposes.



We should

- Follow defined internal and external communication protocols.
- Deliver information in a clear, efficient, agile, fair, and transparent manner.
- To have the necessary authorizations from the Supervisors before making an internal and/or external communication.
- To have permission from corresponding Supervisors to participate in any event or external activity on behalf of Molymet.
- Take care of the form and style of communication. Always maintain an appropriate and respectful language with each of our audiences.



Tools and resources for more information

- Internal Rules of Order, Health, and Safety.



We should NOT

- Communicate directly and indirectly confidential information of the company.
- Transmitting information that may affect the company's image and reputation.



Internal and External Communications and Social Media

Case 1

A friend of mine works for a local media, and she always asks me to share interesting information about the Company. In a few days, we will be communicating internally about a new business that we will be approaching. I am thinking of passing this information on to her for further dissemination.

Will there be any inconvenience?

Even if it is someone close to us and they commit not to disclose the information, we cannot fully trust that this will happen, and it is better to avoid this type of situation. This type of information is confidential, and there are confidentiality clauses in employment contracts. Therefore the information cannot be shared until it is released internally and indicated by the related managers.





Conflict of Interest

The distinction and care of personal interests and those of the Company is our hallmark. We maintain that all Molymet employees must know all the information relating to preventing and reducing any conflict of interest. An employee may not provide services as an advisor or consultant to another organization that is part of the competition or shares, does business, or intends to do business with Molymet. Likewise, any company with a relationship with Molymet, whether as a supplier, contractor or customer, must declare if any conflict of interest exists.

Our Organizational Values and Business Principles Policy indicates this, specifically in the Conflict of Interest Statement.



We should

- Inform if there are conflict of interest with a family member or close person within the same Company or with a supplier, contractor, client, public or regulatory entities.
- To perform their position's activities and as a collaborator of Molymet from an ethical, fair, and impartial perspective.
- Verify that suppliers, contractors, and customers know and comply with our policies on conflict of interest.
- Before entering into a contract and/or transaction, comply with all conflict of interest protocols with suppliers, contractors, and customers.



We should NOT

- Creating or maintaining a contract or relationship with a supplier, contractor, or customer without notifying a conflict of interest.
- Benefiting, sponsoring, or sponsoring persons, institutions, or communities with an interest or personal benefit relationship.



Tools and resources for more information

- Conflict of Interest Statement.
- Crime Prevention Policy.
- Organizational Values and Business Principles Policy.



Conflict of Interest

Case 1

A close family member works for a company that meets the needs you are looking for in a supplier in my area.

I recommend this Company as a supplier?

Yes, you may recommend this Company in the supplier selection process. However, to maintain the objectivity of the matter, you may not participate in the decision-making of the supplier they will hire. You must notify your Supervisor, Senior Management, Corporate Vicepresident of Compliance and Risk, or Ethics Line.

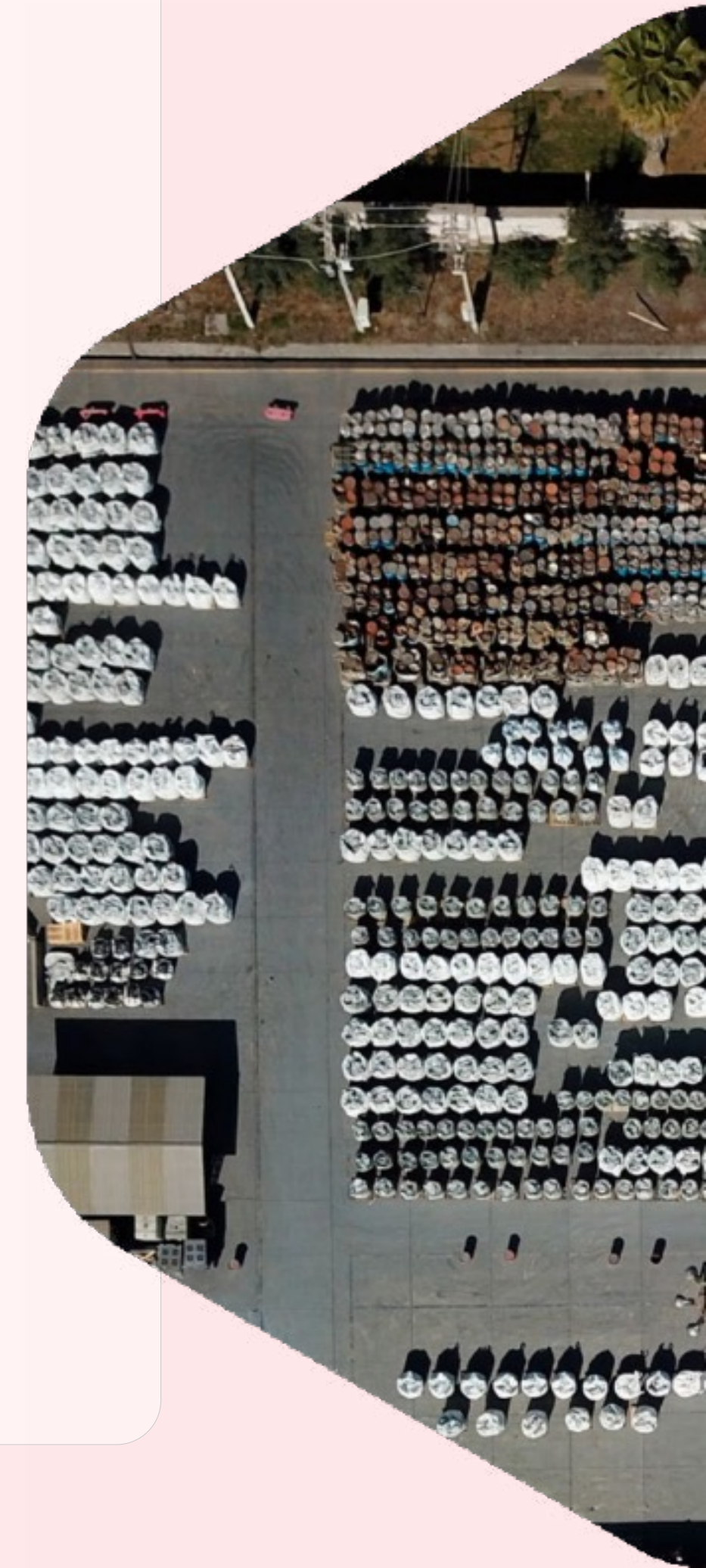
Case 2

Part of my duties is to evaluate some suppliers' bids. In one case, the owner is a close relative. This Company is very specialized and supplies a limited product in the market, so it is difficult to replace it since there would be a risk for the Company not to continue.

Does this constitute a conflict of interest?

Due to your close family relationship, if there is a situation qualifies as a conflict of interest, you must make the corresponding declaration.

In collaboration with your management, you should evaluate the assignment of this task to another employee to study and compare the suppliers' proposals.





Caring for Our Assets and Identity

Everyone belonging to our Company has the responsibility to protect and care for its material and immaterial assets and everything that reflects our corporate identity. Through our Fixed and Intangible Assets Management and Control Policy, we explain and detail the purposes of all kinds of assets, management structures, and processes.

Tangible assets include equipment, inventory, technology, and cash. On the other hand, we consider intangible assets, our brand and reputation, intellectual property, Molymet's information and data, strategic plans, and information for commercial purposes.

We should

- Use Molymet's assets according to the established objectives and focuses.
- Encourage and confirm the protection of assets (tangible or intangible), preventing their damage, loss, misuse, theft, or robbery; communicating in the event of the contrary.

We should NOT

- Put at risk or damage the identity and image of Molymet.
- Use the company's assets for personal benefit, either directly or indirectly.
- Transmit or use any information that affects positively or negatively a supplier, contractor, client, or other groups of interest.



Tools and resources for more information

- Policy of Administration and Control of fixed and intangible assets.
- Internal Rules of Order, Health, and Safety.



Caring for Our Assets and Identity

Case 1

During the workday, maintenance personnel asks for help to fix a device for personal use that is not related to their daily work, nor is it company property.

Is it appropriate to help with my work tools?

You must not use company equipment, devices, or tools for personal use or benefit. You should only use assets for the purposes related to Molymet's operations and processes.

Case 2

A strategic consultancy was hired to create and implement a new work model in the Company. I have a friend who works in a company in a different line of business who has to present a proposal of the same type to her Supervisor but created by herself.

Can I share this consulting proposal?

It is inappropriate to share this type of information with people outside the Company since it belongs to Molymet and is confidential information. Also, the information belongs to a supplier, and we should always take care of the relationship with this supplier.





Human Rights

Knowing, respecting, and protecting people's rights is one of our primary concerns. We subscribe to the Universal Declaration of Human Rights of 1948 and the Guiding Principles on Business and Human Rights of 2011, both United Nations.

We establish mechanisms to monitor and oversee compliance with Fundamental Rights in Labor Relations, the Environment, and the fight against corruption, rejecting child and forced labor and modern slavery in our company and within our stakeholders.



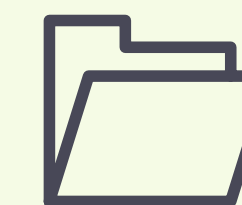
We should

- To act based on trust and respect with each person related to Molymet, whether employees, contractors, suppliers, customers, community, authorities, or other stakeholders.
- To watch over the freedom, dignity, equal opportunities, and inclusion of people.
- To provide fair and equitable remuneration.
- Ensure that everyone has the right to freedom of thought, conscience, opinion, expression and/or religion.
- Provide safe, equitable, and pleasant working conditions.
- Ensure the right to rest, periodically paid vacations, and a prudent working day.
- Guaranteeing the right to maternity and paternity and the care of our employees' children.
- Preventing child and forced labor through identity and age verification, voluntary contracts, and reporting any suspicions of minors working. Furthermore, we strive to prevent such practices throughout our supply chain by monitoring suppliers and clients.



We should NOT

- Remain silent if we witness any action against a person's rights.
- Discriminate against any person, regardless of their condition.
- Establish or maintain a relationship with interest groups that carry out any action that contributes to modern slavery, child and forced labor, or cruel, inhuman, or degrading treatment.
- Judging or influencing the freedom of association and unionization.
- We strictly prohibit any form of child labor and forced labor.



Tools and resources for more information

- Organizational Values and Business Principles Policy.
- Corporate Sustainability Policy.
- Universal Declaration of Human Rights.



Human Rights

Case 1

My Supervisor requests information about my future family planning plans because a new responsibility is being designed and requires a full-time staff member. The project includes traveling out of the country for a long time.

Is this situation correct?

It is not correct, since we watch over the fulfillment of the people's Fundamental Rights, being key the respect and protection of private life.

Case 2

During a visit to a contractor, I observed a minor performing adult tasks in a loading and unloading area. Upon inquiry, I was told that he is "the child of a worker who comes to help from time to time."

Is this situation correct?

This is not acceptable. At Molymet, we reject any form of child labor and promote the unrestricted respect for the rights of children and adolescents. This situation must be reported as it goes against our ethical principles and compliance standards throughout the value chain.





Diversity, Gender Equity, Inclusion, and Non-Discrimination

In Molymet we subscribe that all people should be treated with respect and dignity. We promote and praise diversity, inclusion and non-discrimination through promoting equity, equal opportunities, and meritocracy in our Company.

We strengthen our culture of diversity, respect, and care for our employees and other stakeholders daily, ensuring that we promote personal and professional development transversally in each of our people management procedures: hiring, promotion, training, performance evaluation, and reconciliation of work, family and personal life, among others.

We will not accept any discrimination, harassment, or intimidation based on race, ethnic, social or cultural origin, nationality, language, ideology, opinion or political stance, religion or belief, union membership, gender, sexual orientation, gender identity, marital or family status, age, physical appearance, socio-economic status, illness or disability.



We should

- Contribute and promote responsibility and care concerning diversity, inclusion, and non-discrimination of each person who is part of our stakeholders.
- Express and act with trust, respect, care, and empathy.
- To confront and not accept any conduct that represents exclusion or discrimination.
- To think and act daily without considering prejudices, stereotypes, and biases.
- Act with trust and respect towards all our stakeholders, ensure equal opportunities, offer compensation based on skills and motivation, and open job vacancies to both men and women.



We should NOT

- Discriminating against, harassing, or intimidating a person because of their status, intentionally or unintentionally.
- Acting physically or emotionally that is offensive, insulting, and intimidating because of a person's status. This includes participating in or witnessing any such situation.
- Making jokes, bullying, teasing or harassment about a person's characteristics or condition.
- Disseminating or sharing any offensive material, photographs, text, or images about another person.
- Discriminate in favor or against a person for any condition or characteristic unrelated to performance, ability, or position.
- Discrimination based on sex, gender, or sexual orientation is strictly prohibited. We promote equal and transparent treatment for all our employees, with no distinction between men and women, and expect the same from our suppliers toward their own workforce.



Tools and resources for more information

- Internal Rules of Order, Health, and Safety.
- Organizational Values and Business Principles Policy.
- Corporate Diversity, Equity, and Inclusion Policy



Diversity, Gender Equity, Inclusion, and Non-Discrimination

Case 1

I am a parent, and I have to ask permission to leave before my workday (twice a week) because I need to take my daughter to the pedagogical school. Still, I feel that my professional development may be negatively affected by this family necessity.

What should I do?

Communicate this concern and agree to a solution with your immediate Supervisor. Molymet supports all its employees by providing work flexibility to reconcile their personal/family life with their work life. These situations may be medical treatment, care of a family member, and responsibility with children, among others. If your request is not accepted for no reason, please contact the HR Department to receive support and resolve this situation.

Case 2

A colleague on my team has made several rude jokes about homosexuality. This bothers me, but the rest of them think it's funny.

What can I do about it?

Privately convey your feelings and discomfort to your colleague, and immediately contact your Supervisor. If your concern is not addressed, contact the HR for support and to resolve the situation.



Circular Economy

We base each of our operations - however small or low-impact they may be - on the Circular Economy model to respond to the effects of Climate Change, achieving a positive impact on our environment and enhancing our business from a sustainable vision.

To transition to this new way of being and doing, we constantly redefine current and future processes and projects.

We are committed to continuous and efficient improvement in every action the Company takes. By rethinking the need to reduce, recycle and reuse our resources and waste from each subsidiary, and move towards the full use of clean and renewable energies.



We should

- Consider the Circular Economy model from birth to end of life for every product we produce, discard and sell.
- Rethink, reduce, recycle and reuse resources and waste in every production process and action we take.
- To put aside the concepts of waste and residues as part of the production chain.
- Approach the Circular Economy model from an ethical, social, economic, and not only from an environmental point of view.
- Achieve optimized management of products, material flows, energy, and services.
- Involve other stakeholders in the Circular Economy model, such as suppliers, contractors, and the community.



We should NOT

- Thinking and creating a project, product, or process without considering its impacts and externalities.
- Disregarding the environmental, social, economic, and ethical impacts of a process and/or product.



Tools and resources for more information

- Corporate Sustainability Policy.



Circular Economy

Case 1

I have an idea on how to improve a process from a Circular Economy point of view. I communicated it to my Supervisor, but they are not convinced about changing something that has been done in a certain way for years.

What can I do?

If your Supervisor does not evaluate the possibility of changing the process, you can contact Corporate Sustainability Management to open a space for discussion and review of possible process improvements.

Case 2

On a day-to-day basis, I see some co-workers misusing the recycling waste dispensers, for example, leaving tetra pack containers in the paper and cardboard dispenser.

Should I do something about it?

You can let them know that these actions are not correct and to respect the recycling criteria. Communicate this situation to your Supervisor or Senior Management to reinforce this issue through communication and training.





Copyright

Our intellectual property, innovation, and technology development directly impact our growth, leadership, and success in the market; therefore, their care and protection are of paramount importance. We define and clarify the rules to protect, manage, and follow intellectual property rights through our Intellectual Property Policy. We consider any application or registration of patents, creations, developments, whether tangible or intangible and/or any other form of intellectual property that exists or comes into existence.

All people and institutions related to Molymet are responsible for protecting intellectual and industrial property, whether it is a direct project of the Company, collaborative, or shared development.



We should

- Respect the intellectual property of the Company and third parties.
- To safeguard and keep reserved all information related to Molymet's intellectual property.
- To give notice in case of loss or theft of any documentation and information related, directly or indirectly, to the Company's intellectual property.
- Inform and verify that third parties contain this information on computer security, such as suppliers, contractors, clients, or any other entity or person.
- Transmit our intellectual property protocols to third parties, such as suppliers, contractors, customers, or any other entity or person.



Tools and resources for more information

- Intellectual Property Policy.
- Internal Rules of Order, Health, and Safety.
- Organizational Values and Business Principles Policy.



We should NOT

- Copy, reproduce, publish and distribute information of any application or registration of patents, creations, developments, whether tangible or intangible, of the Company or third parties.
- Act for personal benefit or for third parties, claim intellectual property rights on any invention, creation, or discovery that has been developed with Molymet's direct or indirect resources.



Copyright

Case 1

Suppose I leave my position at Molymet and go to another company. At the same time, I want to leave with specific information about the projects I implemented in the Company since they are of my creation. They would probably help me with other projects and tasks in the new Company.

Can I do it?

Although they are projects created by you, they were built within the Company's operations and processes. Therefore, it is Molymet's intellectual property, and you will not be able to use this information outside the Company.





Gifts

Giving a gift can be considered a way of thanking another person for their work and attention. However, Molymet need to avoid corruption and conflict of interest. Therefore, it is not allowed for company Supervisors or employees to receive or indirectly offer invitations or gifts from related third parties, such as suppliers, contractors, customers, competitors, or public officials.

Depending on the context, gifts and invitations worth up to USD 122 may be accepted from suppliers, contractors, customers, or competitors. They must be reported to direct management and the Corporate Vice-Presidency of Compliance and Risk. Gifts or invitations from public sector employees are strictly prohibited regardless of an employee relationship.



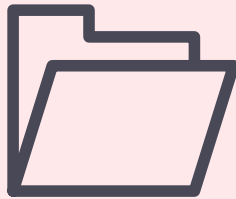
We should

- Reflect on the gift’s intention, even if it’s within the allowed amount, and see if it aligns with our values.
- Inform your Supervisor immediately in the event of receiving a gift or invitation. Also, inform the Corporate Vicepresident of Compliance and Risk, regardless of the amount involved.
- Ensure that suppliers, contractors, and customers are aware of and comply with our protocols on gifts and entertainment.



We should NOT

- Accept or offer directly or indirectly, i.e., through relatives, an invitation or gift over USD 122 from suppliers, contractors, customers, competitors, or Financial Institutions.



Tools and resources for more information

- Organizational Values and Business Principles Policy.



Gifts

Case 1

I had a meeting with one of our suppliers, and they brought some of their Company's products as a gift, saying they are overstocked. We have been working with this supplier for several years, but I am not sure if I should accept them or not.

What should I do in this situation?

According to the current internal policy on gifts, if these products exceed USD 122, you will have to thank them for their gesture and explain that you will not be able to accept this gift. If the amount of the gifts is less than USD 122, analyze the situation, and if you think there is an ill intention, it is better to refuse this gift. Contrarily, if you see it as a cordial gesture from the supplier, you can accept it. Always communicate this situation to your immediate Supervisor and the Corporate Vice-Presidency of Compliance and Risk.





Respect and Community Contribution

We honor and respect the sustainable and long-term relationship with the community, especially those neighboring our operations. We seek to promote local development and benefit, where transparency, closeness, credibility, care, and two-way communication are key.

By promoting participation, understanding, and active reflection on our environmental impact, we decrease difficulties within the community.



We should

- Be empathetic in every action we take as an institution with the community and other stakeholders in the vicinity of Molymet's facilities.
- Take into account the views and expectations of all stakeholders during the decision-making process.
- Listen and promote multidirectional communication to respond to their needs, remarks, and concerns.
- Generate initiatives that generate economic development in the community.



We should NOT

- Promise a project or action to the community on behalf of the Company without approval.
- Benefit or favor a specific community group that is politically, ethnically, or otherwise related to politics, ethnicity, or other.
- Ignoring complaints, suggestions, and/or comments made by the community.



Tools and resources for more information

- Corporate Sustainability Policy.
- Organizational Values and Business Principles Policy.



Respect and Community Contribution

Case 1

A community representative is part of my family circle. They contacted me and told me that they were bothered by the movement of several trucks from one of Molymet's facilities.

What can I do?

There are mechanisms and teams to listen and respond to community concerns and worries. It is the responsibility of each subsidiary, and its community relations team, to solve this. You can communicate with the area in charge of this situation and/or propose to the community representative to contact them directly.

Case 2

I have read complaints on social media from one of our subsidiary's community members making attempts to get in touch with the Company but have not yet received a response.

Can I do something about it?

It is the responsibility of each subsidiary and its community relations team to respond to inquiries and requests. You could contact them, describe your concerns and what you saw on social media, and improve the situation.





Environmental Impact and Responsibility

Our focus is on preventing, controlling, and reducing our environmental impact and risks through our Corporate Environmental Policy, Environmental Management System, and various certifications.

We will take care of these main environmental aspects:

Air: We are committed to protecting air quality, so we are below permissible limits. We rigorously measure, monitor, and reduce our emissions and carbon footprint.

Water: We reduce and manage our water consumption constantly in all operational processes, using this resource efficiently, recirculating, reusing, and reducing its extraction.

Energy: The rational and efficient use of energy is our duty, as it is one of the most critical inputs for our operations. Management, use, and care of energy are essential for promoting clean and renewable sources.

Soil: Our operations have a significant impact on soil quality. Therefore, we will ensure a management and measurement system of waste produced to define a set of actions regarding our performance.



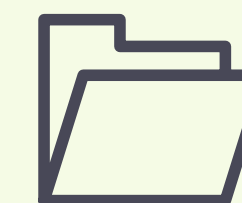
We should

- Use sustainable skills like observing, reflecting, conversing, and acting to diminish the environmental impact that an action, operation, or project may have.
- Analyze and continuously improve to alleviate environmental impacts on air, water, energy, and soil.
- In detecting any risk or incident impacting the environment and subsidiaries' surroundings, we must immediately report what happened and interrupt operations if necessary.
- Involve other stakeholders in the responsibility and reduction of its environmental impacts, such as suppliers, contractors, and the community.



We should NOT

- Forget and not comply with the defined norms and protocols that promote the care and reduce environmental impact.
- Omitting any environmental impact in current or new processes, operations, or company projects.
- Neglecting or not doing anything against a possible risk or incident that negatively impacts the environment.



Tools and resources for more information

- Corporate Sustainability Policy.
- Corporate Environmental Policy.
- Environmental Management System.



Environmental Impact and Responsibility

Case 1

During our activities in the plant, I see that a person in my team is making certain decisions that are a risk and not allowed in internal protocols and instructions. It could trigger an environmental incident.

What should I do?

Quickly stop any team action to prevent an environmental incident from negatively impacting the subsidiary's environment. Therefore, let your immediate Supervisor know what happened to improve processes and learn as a team. Likewise, contact Senior Management to notify, encourage and prevent this situation.

Case 2

In the middle of hazardous waste removal, liquid leaks and falls near a water canal it crosses. The incident is kept secret to avoid a reprimand, and removal operations continue.

What should I do?

Transparency and Integrity are company values. Therefore, we ask you to report this situation promptly since this spill may contaminate the canal used for irrigation. Communicate this situation to your Supervisor or Senior Management.

Case 3

Our operations' waste hauling trucks are leaking and dumping waste on the roadway outside the Company's facilities.

Should I report this situation?

Yes, it is essential to report this situation because, although it is an external impact on Molymet's operations, it impacts the environment and community around us and our Company's reputation.



Information Security

In an era where technology and digitalization are the basis of everything, we must provide security and protection to our personal and corporate information.

We disapprove of the use of privileged and confidential information for personal, financial, or other people's benefit, as it goes against our principle of equal market opportunities and regulations.

Any person who has access to Molymet's information and technological resources has the duty and responsibility to use them ethically. To use them only as elements of work, respecting corporate procedures and policies and the region's current legislation.

The information generated in and for Molymet is company property, not of the user who develops it.

The information must be treated as an asset of Molymet, taking care of and protecting it.

Through our Information Management Manual, which presents our position regarding confidentiality and safeguarding of information, we define which people and positions will have access to confidential or critical information, along with a clause in their employment contract.



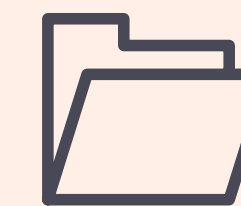
We should

- Safeguard and keep in complete confidentiality all information known directly or indirectly, confidential or of a sensitive nature.
- Maintain extreme care in the possession, custody, transmission, and conservation of information.
- Safeguard any knowledge of technical, scientific, or commercial aspects acquired in the Company in the performance of our duties or indirectly.
- Give notice in case of loss or theft of any documentation containing knowledge of technical, scientific, or commercial aspects.
- Not deliver any company knowledge to third parties, inquiries, achievements, collaborations, or business for up to two years after the end of their functions in Molymet.
- Inform and verify that third parties contain this information on computer security, such as suppliers, contractors, clients, or any other entity or person.
- Be careful with the opening of unknown e-mails and/or suspicious links that may violate security.



We should NOT

- Copy, reproduce, publish and distribute technical, scientific, commercial, financial, or other information relevant to Molymet.
- Copy, reproduce, distribute and/or provide to third parties any application or result developed by the Company (processes, utility models, designs, programming techniques, flow charts, software or computer programs, codes, and documentation owned by Molymet or third parties).
- Use and/or keep in your possession software or computer programs that you handle or have access to, except with the written authorization of a Supervisor.
- Remove from the workplace or transmit by any means documents and information containing total or partial reproduction of computer programs or other information.



Tools and resources for more information

- Market Information Management Manual.
- Internal Rules of Order, Health, and Safety.



Information Security

Case 1

I have noticed that some people in my team use their work e-mail to pay bills or contact their bank. In addition, others have downloaded electronic games and applications for personal use.

Is this okay?

All tools provided by the Company for your progress and performance are for work use only. This behavior is also risky because it generates chances of sending unwanted e-mails, viruses, or impersonating identities for information theft (phishing).

Case 2

A team member tells me that he has received information from a supplier through online folders, but this action is blocked when he wants to download them. He told me that he would download it through his personal computer and then transfer the information to the Company's computer.

Is this correct?

This action is not allowed since it jeopardizes Molymet's information security equipment, so you should ask the supplier to send the information through another secure medium that Molymet allows. In case of any complications, please contact our Information Security area. They will be able to find a safe and effective solution.

Case 3

In a construction project with a third party, you need to deliver confidential plant information to continue working. So as not to interrupt the work, the person responsible for the information intends to send it without verifying safety protocols.

Is this allowed?

First, the organization maintains and handles sensitive and confidential information, so whenever you need to share information with third parties, you should talk to a superior and verify the confidentiality agreement. Secondly, you should always consider the Company's security protocols when sending information, which may vary depending on information handling and arrangements with the counterpart. Finally, you must evaluate the channel for sending the information, which should be through your work e-mail, and decide, depending on the relevance, if you will send the information encrypted or unencrypted. Remember to verify with your Supervisor when sharing sensitive information.

If you have a question or query, contact seguridaddelainformación@molymet.cl we are here to help."



Health and Safety

Our organization considers it is critical to provide healthy and safe working conditions for each person related to Molymet, as employees, suppliers, and contractors. Our commitment is for each person to strictly follow these standards for their self-care and care of others. We strive for compliance with high standards, and our goal is to have zero accident toll.

We streamline our procedures through several occupational health and safety policies, which show our focus, priority, and proactivity in reducing risks to deliver a safe and quality-based work environment.



We should

- Comply with Occupational Health and Safety Policies and all other requirements.
- Always follow safety and health precautions protocols.
- Use full personal protective gear as appropriate to the task, as well as ensure that others do so.
- Interrupt and notify your Supervisor at the time of any unsafe action that may put others and company facilities at risk.
- Make sure you know what to do in the event of an emergency or crisis.
- Communicate to your Supervisor any concerns or actions taken by yourself or another team member that may put health and safety at risk.
- Ensure suppliers and contractors understand and practice our safety and health guidelines.
- Provide spaces and platforms for ongoing training in Health and Safety.



We should NOT

- Forget or disregard the Company's occupational health and safety protocols.
- Carry out an activity or task we are not aware of and the impact it may have and/or that I have not been trained for.
- Show up at the workplace and carry out any activity under the influence of drugs (legal, illegal, or prescribed by a doctor).
- Failure to comply with occupational health and safety standards at social gatherings, celebrations, or integration activities, even when these, due to their social nature, include moderate alcohol consumption.
- Possessing, distributing, consuming and/or selling illegal drugs on company premises.
- Delegating to others the reporting or detection of any risk situation or incident.



Health and Safety

Case 1

I work in an administrative area, however, when we walk through the industrial area, we must wear our safety and personal protection gear. I have noticed that some of my colleagues do not use their personal protection glasses.

How do I deal with this situation?

First, remind your team of the safety conditions that must be followed at Molymet.

If they do not change their attitude, you should communicate this behavior to your Supervisor immediately or contact Health and Safety Department.

Case 2

A member of my team mentions some of his personal protective equipment is in bad shape. He is convinced that nothing will happen to him, so he puts off ordering new ones for a few weeks.

What should I do?

Get in touch with Health and Safety Department and report the occurrence, requesting team training for health and safety awareness.





Selecting and relating to Suppliers and Contractors

Selecting and relating to suppliers and contractors is critical to our operations, adding value and achieving long-term success for the business.

Therefore, to make them strategic partners as well as enhancing mutual value chains, they must be aligned with our purpose, values, and sustainable commitments.

Our Procurement, Services and Authorizations Policy - among other policies and affidavits - addresses Integrity and ethics issues with suppliers and contractors. These range from adherence and compliance with high standards of Integrity and ensuring equal opportunity in awarding projects to conflict of interest, money laundering, financing terrorism and bribery, information confidentiality, labor rights legislation compliance, and tax payment.



We should

- Select and hire suppliers and contractors according to company needs, competitiveness and best market offer.
- Award projects to suppliers and contractors under fair and equal opportunity practices.
- Demonstrate clear offers, along with project goals and selection criteria.
- Ensure suppliers and contractors comply with the Company's purpose, guidelines, and ethical requirements.
- Comply with agreed conditions for deadlines, processes and payments with suppliers and contractors.
- Protect confidential supplier and contractor information to which Molymet has access.
- Certify suppliers and contractors understand and practice our ethical guidelines.



We should NOT

- Hire suppliers or contractors with conflict of interests.
- Hire a supplier or contractor knowing they infringe human rights, transparency, or the Company's sustainability guidelines.
- Directly or indirectly receive invitations or gifts from suppliers and contractors, more than USD 122.
- Retain a supplier or contractor contract that transgresses company trade requirements, suitability, or ethical guidelines.



Tools and resources for additional information

- Procurement, Services and Authorization policies.
- Corporate Sustainability policy.
- Conflict of interest affidavit.
- Sworn confidentiality agreement.



Selecting and relating to Suppliers and Contractors

Case 1

We are in the process of assessing contracting a supplier and are requesting that he sign the corresponding sworn statements required by our internal policies. However, the supplier refuses to sign the conflict-of-interest affidavit, stating no such condition exists.

Can the contract process continue?

All Molymet suppliers and contractors must comply with the protocols and requirements previously established to comply with the internal policy and ethical guidelines. If the supplier refuses to sign the conflict-of-interest affidavit, it will not be possible to continue with the contract process.

Case 2

In assessing two proposals for service provisions, the contractor offering a higher price is a close friend of the person in charge of awarding contracts. He justifies that the contractor's quality is higher because he knows that they will do a better job justifying the higher price.

Can this contractor be selected?

In this case, there is a conflict of interest, so it must be notified and left out of the decision process. We must always follow the defined protocols for selecting and contracting suppliers and contractors and making objective decisions. notify your Supervisor, Procurement Department, Corporate Vicepresident of Compliance and Risk, or Ethics Line.





Transparency

Transparency is at the core of our being and doing as an organization, where trust and understanding characterize us in every action we take.

We declare that all products traded by Molymet and our operations and the actions of our leaders and Senior Management derive from operations and procedures that are lawful, upright, transparent, and accountable to each stakeholder.

Likewise, it is essential to provide truthful, complete, and transparent information through corporate reports and statements. We will not tolerate lies and the dissemination of false information.



We should

- Consider transparency as essential to the responsibilities and commitments of each collaborator, Supervisor, supplier, and contractor of Molymet.
- Communicate and involve other stakeholders in Molymet's manner and activities all based on transparency and integrity.



We should NOT

- Forget transparency is one of our main values.
- Hide manipulation or information misrepresentation of internal processes or official company documents.
- Omit under any circumstance our guiding actions which based on transparency and ethics.



Tools and resources for more Information

- Corporate Sustainability Policy.
- Policy, Organizational Values and Business Principles.



Transparency

Case 1

A report has been requested on specific information in the Sustainability Report. However, a measurement error is found. Upon realizing the mistake, the person in charge of the area requested hiding the data to keep it silent as credibility was at stake and the area's leadership would be affected.

What should I do?

This action contradicts company values from the commitment and responsibility acquired by all Molymet's employees regarding transparency and dissemination of truthful and complete information. At Molymet, we are known for taking full responsibility for our management, including any mistakes we may undertake. In a situation such as this, we must immediately report the error and correct it quickly since the Company's reputation and sustainability are at stake. The interests of the Company and the common good must always prevail over personal interests.

Case 2

My boss asked me to play with the numbers to make this quarter's results look better and then to correct them for the next quarter. He implied that if I didn't, I could lose my job. It doesn't seem like the right thing to do, but I'm scared.

What should be done in this type of situation?

Do the right thing; reports must be made accurately and in a timely manner. Under no circumstances will implied threats or attempts to intimidate employees into committing unethical acts be tolerated. You should report the conversation you had with your Supervisor, Senior Management or to the Ethics Line.



Business trips

Relationships and exchanging knowledge and experience between subsidiaries and customers. Our aim is that these specializations support the development and continuous improvement.

Certain cases related to travel representing our Company domestically and abroad where expenses of employees and third parties may be justified. For this purpose, we have a Travel, Meeting Attendance, and Expense Claims Policy, which guides our conduct aligned with our essence and purpose as an organization.

We declare as a company that during business trips, our employees may not accept invitations or paid expenses from suppliers, contractors, customers, or competitors.



We should

- Behave ethically and follow the Company's philosophy of austerity, incurring in reasonable and common sense expenses.
- Have the prior authorization of the CEO and Vicepresident for a trip or attendance to international seminars or congresses.
- Plan expenses for travel or attendance at seminars and congresses.
- Consider this economic principle: tickets and hotels shall be the most convenient and reasonable price, by tour operators serving and holding agreements with the Company.



We should NOT

- Take trips or attend unnecessary seminars and congresses.
- Accept payment from suppliers, contractors, customers, or competitors for travel or accommodation.



Tools and resources for additional information

- Policy on Travel, Conference Attendance and Expense Claims.
- Policy on Organizational Values and Business Principles.



Business trips

Case 1

During a business trip, one of our clients offered us to stay a few extra days in a hotel paid for by them so that we could get to know the city.

Can we accept the offer?

We declare in our company policy that our employees cannot accept invitations and paid expenses during business trips from suppliers, contractors, customers, or competitors. Therefore, this offer can not be accepted. For further awareness, notify your Supervisor and/or the Vicepresident of Compliance and Risk.

Case 2

A person on my team had a business trip. He incurred expenses under budget, so he will consider reimbursement of two adulterated tickets and obtain a larger refund of his money.

Is this right?

No, this infringes Molymet's values, so you must notify your area manager, Corporate Vicepresident of Compliance and Risk, or the Ethics Line.

Case 3

An employee on a business trip takes advantage of the hotel accommodation to include his partner.

Are we allowed to do this?

No, the cost of lodging covered by the Company only considers the employee. Traveling with family members on business trips is not authorized.

Case 4

A person in my team will have a business trip with a high expense planning without considering the principle of economy, selecting for example, a hotel stay with very high above-average prices.

Is this the right thing to do?

No, this is against Molymet's principles, so you must notify the Corporate Vicepresident of Compliance and Risk.



Corporate Sustainability and Due Diligence

As a company, we deeply value sustainable business practices and strive for continuous improvement in this area. We are committed to operating under the “due diligence principle,” through which we identify, manage, prevent, or stop sustainability-related risks across the value chain, in line with the OECD framework. These risks include corruption, any form of abuse, money laundering, among others.

Measures are implemented to monitor suppliers in high-risk situations, a new risk assessment is carried out annually.

These standards apply not only to Molymet but also to our suppliers, and we expect our suppliers to implement them in their own operations.



We should

- Identify potential or existing negative risks related to human rights, labor practices, and environmental concerns within the company.
- Report any adverse effects of activities through the available reporting channels.
- Monitor and follow up on any negative impacts among suppliers.
- Communicate transparently about due diligence efforts within the company.
- Where applicable, ensure that suppliers adhere to Molymet’s Corporate Due Diligence Policy for the Molybdenum Supply Chain.



We should NOT

- Ignore warning signs in the supply chain, such as lack of traceability or reports of poor labor or environmental practices.
- Fail to report situations that could violate human rights, harm the environment, or involve corruption.
- Engage in or be complicit in practices that facilitate money laundering, finance armed groups, or circumvent regulatory controls.



Tools and resources for more information

- Corporate Sustainability Policy
- Corporate Due Diligence Policy for the Molybdenum Concentrate Supply Chain.



Corporate Sustainability and Due Diligence

Case 1

During an informal meeting with a supplier, they mention that their trucks must travel through a high-risk area in the north of the country to transport molybdenite. They note that, on occasion, they have encountered armed groups and paid a premium to be allowed to continue their route. When asked if they have any protocols or measures to ensure they are not directly or indirectly contributing to armed conflicts, they respond that they do not consider it necessary.

Is this situation acceptable?

This situation is not acceptable. At Molymet, we follow the OECD Due Diligence Guidance, which require identifying, preventing, and mitigating risks associated with conflict-affected and high-risk areas (CAHRAs). The payment to armed groups, as well as the lack of control mechanisms, poses a serious risk for the Company and violate our commitment to responsible sourcing. This situation must be reported immediately through the Ethics Line.





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