



POLICY FOR THE PREVENTION OF MONEY LAUNDERING, TERRORIST FINANCING AND BRIBERY CRIMES

Molibdenos y Metales S.A. and Subsidiaries
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2	-Crimes of Receiving actualization included in Law 20.393. -Management and Vicepresidency's update -Conflict of interest form actualization	VP of Compliance	Javier Bahamondes Cancino, Chief of Compliance and Risk	October 2019	n/a	01.11.2019
3	-Process and Risk activities of bribery between privates, disloyal administration, misappropriation and inappropriate business dealings Added. -Prevention Officer appointment date update. -Conflict of interest sworn declaration actualization. Including requirements and general reviews. -Workforce Control measures regarding background check is updated.	VP of Compliance	Javier Bahamondes Cancino, Chief of Compliance and Risk	October 2022	n/a	14.10.2022
4	-Policy adapted to include the extension of the Prevention Model to the subsidiaries MolymetNos and Molynor -Reporting line of the Prevention Officers of the subsidiaries and the Corporate Prevention Officer is specified. -A chapter on Law 21,595 regarding Economic Crimes and Environmental Offenses is included	VP of Compliance	Javier Bahamondes Cancino, Chief of Compliance and Risk	June 2024	15/10/2024 Session N°1026	30.09.2024

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I. INTRODUCTION

This Policy for the Prevention of Crimes of Money Laundering, Bribery and Financing of Terrorism constitutes an instruction for all the personnel of Molibdenos y Metales S.A. and its subsidiaries in Chile (hereinafter, Molytmet), on how to prevent the commission of the aforementioned crimes in the different activities and processes carried out by the company in the fulfillment of its line of business.

In December 2009, Law No. 20,393 was enacted in Chile, which establishes the criminal liability of legal entities in the crimes of money laundering, financing of terrorism and bribery. This implies that companies must implement a Crime Prevention Model.

In this regard, the law states the following:

"Article 3. - Attribution of criminal responsibility. Legal persons shall be liable for the crimes referred to in Article 1 that are committed directly and immediately in their interest or for their benefit, by their owners, controllers, managers, principal executives, representatives or those who carry out administration and supervision activities, provided that the commission of the crime is the result of non-compliance on the part of the latter of the duties of direction and supervision.

Under the same assumptions as in the previous paragraph, legal persons shall also be liable for crimes committed by natural persons who are under the direct direction or supervision of any of the subjects mentioned in the previous paragraph.

The duties of direction and supervision shall be deemed to have been fulfilled when, prior to the commission of the offence, the legal person has adopted and implemented organizational, administrative and supervisory models to prevent offences such as the one committed, in accordance with the provisions of the following article.

Legal entities shall not be liable in cases where the natural persons indicated in the preceding paragraphs have committed the crime exclusively for their own advantage or in favor of a third party."

It should be noted that the foregoing is without prejudice to individual responsibilities for the commission of any of the crimes indicated, which will in any case be legally prosecuted.

For the purposes of Law 20,393, the designation of a Crime Prevention Officer and the preparation of this Crime Prevention Policy are considered, as part of a Crime Prevention Model, together with other company policies, which are referenced throughout this document.

In relation to Law 20,393 and complementary to it, it should be noted that the Foreign Corrupt Practices Act (FCPA USA, 1977) has been replicated throughout the world and, on the other hand, anti-corruption actions and accuracy in accounting records have emerged as two of the major corporate governance issues in recent years. Therefore, legislation in Chile has been adapting to the new requirements in these matters.

II. GENERAL GLOSSARY

Administration of the Legal Entity: According to Article 4 of Law 20,393, the Administration of the Legal Entity is the highest administrative authority of the legal entity, whether it is its board of directors, a managing partner, a manager, a principal executive, an administrator, a liquidator, its representatives, its owners or partners, as appropriate to the form of administration of the respective entity.

Bribery¹: Giving, or consenting to give an economic benefit (also known as bribery or bribery) to a national or foreign public employee, for the benefit of that or a third party, so that he or she performs an action or incurs an omission, in relation to his or her position. Some examples of economic benefit are the financing of trips, the granting of gifts or invitations or the delivery of money to public employees.

Money Laundering¹: The concealment of the illicit origin of certain assets (activities), or their acquisition, possession or use, with the intention of making them appear legitimate, knowing that they come from the perpetration of certain crimes.

Financing of Terrorism¹: The direct or indirect facilitation of funds for use in the commission of terrorist crimes.

Prevention System: Set of elements whose purpose is to prevent the company's workers from being involved in any illicit activity related to money laundering, terrorist financing and/or bribery, for which the company could be held responsible. The minimum elements that the system must contemplate are: identification of activities or processes in which the risk of committing crimes is generated or increased; the establishment of specific protocols, rules and procedures to prevent the commission of crimes; identification of procedures for the administration and audit of financial resources to prevent their use in crimes; and the existence of internal administrative sanctions and procedures for reporting or pursuing pecuniary responsibilities against persons who fail to comply with the crime prevention system.

Suspicious transaction: Any act, operation or transaction that, in accordance with the uses and customs of the activity in question, is unusual or lacks apparent economic or legal justification, whether it is carried out in an isolated or repeated manner.

¹ See legal definition in Annex 1 "Legal Glossary".

III. OBJECTIVE

The purpose of this policy is to establish a prevention mechanism for the crimes of Money Laundering, Financing of Terrorism and Bribery, in compliance with Article 4 of Law 20,393. This policy guides and instructs Molymet's employees on the measures aimed at mitigating the risks to which the entity is exposed in this regard.

IV. SCOPE OF THE POLICY

This policy, as stipulated by law, shall apply to Molymet's board of directors members, managers, officers, employees, suppliers, customers, service providers, contractors, subcontractors and temporary staff, in accordance with the provisions of applicable law.

This document will be reviewed and updated at least every two years, or when there is a justified cause for it, such as, for example, changes in the activities carried out by the Company, or modifications in the Law.

Molymet requires all its personnel, both commercial, operational and support areas, to behave with integrity, upright, strict and diligent, in compliance with the rules on the Prevention of Bribery Crimes, Money Laundering and Terrorist Financing, since its workers understand that responsibility in the matter is everyone's task. Therefore, its conduct is governed by the Policy on Organizational Values.

In addition, in the context of a culture of internal control and compliance with the policies for the prevention of the aforementioned crimes, permanent training programs are contemplated for all members of the organization, which make it possible to know and detect the risks in this area, deepen the understanding of the legal norms that regulate the prevention of such crimes and demand compliance with them. The above also seeks that each worker develops the necessary capacity to detect unusual or suspicious operations, through adequate knowledge of the customer and their operations.

V. PREVENTION OFFICER

As stated in the Minutes of the Board of Directors of Molymet S.A. No. 840, of December 7, 2010, the Board of Directors appointed the current Corporate Audit Manager, Ms. Claudia Avendaño Rozas, as Head of Prevention for the crimes of Bribery, Money Laundering and Financing of Terrorism, as stipulated in Article 4 of Law 20,393. This position will be in force for a maximum period of three years, which may be extended for periods of equal duration, with the agreement of the Board of Directors.

The designated Person in Charge represents, with his actions, the values that the company has such as ethics, commitment, responsibility and innovation. In addition, he has a full knowledge of:

- The functions and those responsible for each area of the company.
- Legislation, regulations emanating from legitimate and competent regulatory authorities.
- The Organizational Values Policy, policies and procedures, regulations and other internal instructions held by Molymet.

VI. MEANS AND POWERS OF THE PREVENTION OFFICER

The means for the Prevention Officer to carry out his or her work properly are as follows:

- Direct access to the "Administration of the Legal Entity" (Molymet's Board of Directors) to inform you of the fulfillment of your duties.
- Maintain autonomy with respect to other managements.
- Have a budget for crime prevention initiatives (reporting channel, dissemination of the reporting model and channel, respective training, etc.) and to carry out compliance reviews of the System for the Prevention of Bribery, Money Laundering and Terrorist Financing Crimes.
- Have a team of trained auditors to support the control and monitoring of the Crime Prevention Model.

- Have the basic tools for the proper functioning of their work such as an office, meeting room, computer, among others.

The Prevention Officer is responsible for:

1. Coordinate that the different areas of Molymet comply with the laws and regulations for the prevention of the aforementioned crimes.
2. Report their management at least semiannually to the Administration of the Legal Entity (Molymet's Board of Directors).
3. Promote the design of appropriate procedures for the prevention and control of the crimes stipulated in Law 20,393.
4. Verify compliance with this policy and the Policy on Organizational Values, to prevent improper conduct in the daily actions of employees. This can be done through the accredited delivery of the Policy on Organizational Values, verifying that training on these matters is being developed for personnel and that there are reports of complaints of breaches of the Policy on Organizational Values, among others.
5. Initiate an internal investigation when there is a complaint or a suspicious situation that warrants it and issue a report on it. (For more detail, see 10.1 "Suspicious Activity Reporting Channels")
6. Gather the necessary means of evidence, including computers or means of records to carry out the investigation.
7. To request the Chief Executive Officer (CEO) to suspend the functions of the persons under investigation.
8. To know and maintain communication with the competent authorities in relation to the matters contemplated in Law 20,393, reporting the cases that merit it.
9. Keep the Policy for the Prevention of Bribery, Money Laundering and Terrorist Financing Crimes up to date. Likewise, verify that the Policy on Organizational Values and internal regulations or procedures are kept up to date, in accordance with the relevant legislative changes in the country.
10. Determine specific audits for the verification of compliance with this document. In addition, agree on its scope and extension within the Corporate Internal Audit program.
11. Verify the design and execution of a training program for compliance with the Prevention System, aimed at Molymet workers.

VII. ETHICS COMMITTEE

The designated Ethics Committee, which includes, among others, 3 Directors, the Executive President and the Crime Prevention Officer, has the following functions in relation to the prevention of bribery, money laundering and terrorist financing crimes:

Know and analyze the cases investigated and reported by the Crime Prevention Officer.

- In cases where the analysis corresponds to a current or potential supplier or customer, and in the event that the Committee determines that it will not be possible to operate with this supplier or customer, the Committee must inform, through the Prevention Officer, the corresponding areas and the Supplier/Customer will be blocked in the systems. In addition, it will be reported to the competent authority through the Prevention Officer.
- Together with the Corporate HR Management, define and apply the administrative sanction to the worker at any hierarchical level who, according to the merit of the background analyzed, has transgressed or failed to comply with the stipulations of this policy, without prejudice to what may be established by a possible judicial investigation into the same case.

Notwithstanding what is indicated in the previous point, the sanction will be applied to the worker by his direct supervisor or by the HR Management.

VIII. BOARD OF DIRECTORS

The Board of Directors has the following functions in relation to the prevention of crimes of bribery, money laundering and financing of terrorism:

- Promote and disseminate ethical values within the company.
- To appoint the Crime Prevention Officer and define his means and powers.
- Approve the Crime Prevention Policy.
- Know and analyze the cases investigated and reported by the Crime Prevention Officer.

IX. CRIME PREVENTION SYSTEM

9.1 General crime prevention regulations

Policies and Procedures

All policies and procedures that establish definitions, regulations and controls for the company's activities must be duly documented and disseminated within the reach of all personnel who may be affected by them.

Policy on Organizational Values

Molymet is strongly committed to conducting its operations and business transactions with honesty, integrity, and in full compliance with all applicable laws. No Molymet employee is authorized to commit an illegal or immoral act.

Within the scope of their professional activity, Molymet employees must diligently respect the laws in force, the Policy on Organizational Values and internal regulations. To do so, Molymet workers must be familiar with, understand and operate in strict compliance with the applicable laws and regulations.

Molymet requires all its personnel to behave uprightly, strictly and diligently, in compliance with the rules on the Prevention of Bribery Crimes, Money Laundering and Financing of Terrorism, contained in the respective Internal Policy.

In particular, workers and their managers must not offer, promise, give or consent to give an economic benefit to a public or private employee, whether Chilean or foreign, under any pretext or circumstance, or of any nature, in the case of being a foreign public employee. This restriction includes, among others: hotel stays, or tickets for transportation in any of its modalities, commissions, bonuses, prizes or profit sharing, in money or in kind, to obtain a benefit for the company.

Employment Contracts of Workers

All employment contracts must incorporate the obligations, prohibitions and internal sanctions for the crimes provided for in Law 20,393, so they must have clauses with obligations and prohibitions linked to the matters regulated by the aforementioned law. These clauses must be included in an Annex to the employment contracts, in the case of former workers.

Internal Order, Hygiene and Safety Regulations

The Internal Regulations on Order, Hygiene and Safety must incorporate the obligations, prohibitions and internal sanctions for the crimes provided for in the Law 20.393. In the event that special sanctions (e.g., fines or dismissals) are imposed on workers who fail to comply with the obligations established in relation to the Law, these should in any case be regulated in the Internal Regulations on Order, Hygiene and Safety. The same will happen in the event that procedures for the investigation of possible criminal conduct within the Company are regulated. These procedures must be regulated in the Internal Regulations on Order, Hygiene and Safety, and this regulation must be reviewed in the light of the regulations relating to the fundamental rights of workers.

9.2 Activities, processes and businesses that present or increase the risk of committing the crimes of bribery, money laundering and terrorist financing

Risky processes and activities for Molymet

Risky Activity/Process	Crime Law 20.393	Vice President/Related Management
Audits by Public Bodies in General	Bribery	Sustainability Management; Vice Presidency of Management Control; HR Corp. Management; General Management of Carbomet; Accounting Management Corp.; Vice-presidency of Planta Nos; MolyNor Plant Management
Export and Certificate of Origin	Bribery	Logistics Deputy Manager
Applying for Project Approvals and New Business in China	Bribery	Sustainability Management; VP Internac. and New Business
Environmental approvals and inspections	Bribery	CSR Corp. Management; Sustainability Management; Production Management; Supply Management; Corporate Legal Management; Corporate CSR Management
Acceptance and maintenance of Suppliers and Service Providers	Money Laundering, Terrorist Financing	Vice Presidency Corp. Invest. and Development; Vice Presidency of Management Control; VP Engineering; Commercial VP; VP MolymetNos; Abast. Management; VP Finance; VP Oper. Mx and Real Estate; VP Internac. and New Business; VP Corporate Affairs
Customer Acceptance and Retention	Money Laundering, Financing of Terrorism	Commercial VP; VP Internac. and New Business; Gerencia Gest. Subsidiaries

Sales to public sector customers	Bribery	Commercial VP; VP Internac. and Nuevos Negocios; Gerencia Gest. Subsidiaries
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Risky Activity/Process	Crime Law 20.393	Vice President/Related Management
Commercial relationship with Codelco for Maquila contracts	Bribery	Commercial VP
Sulfuric acid inventory management: production, purchase, custody, sale, and use.	Money Laundering Terrorist Financing	Supply Management; Sales Management Asia
Handling of explosives (powdered aluminium)	Terrorist Financing	Supply Management
Acceptance of scrap suppliers	Money Laundering	Supply Management
Invitations and gifts to and from third parties	Bribery	Sustainability Management; VP Internac. and New Business; VP Oper. Mx and Real Estate; Real Estate Management; CSR Corp. Management; Branch Management Management; Commercial VP; VP Finance; VP MolyMetNos
Granting of donations	Bribery, Money Laundering, Terrorist Financing	Donations Committee
Buying and Selling Real Estate	Bribery, Money Laundering, Terrorist Financing	Executive Presidency; VP Oper. Mx and Real Estate; Real Estate Management; VP Corporate Affairs
Employee and Third Party Travel	Bribery	All Managers and Vice-Presidencies
Fixed Fund Allocation and Administration	Terrorist Financing, Bribery	Finance Management Corp.; VP MolyMetNos; General Management Carbomet; Real Estate Management; Molynor Plant Management
Cash collections (property leases)	Money Laundering	VP Oper. Mx and Real Estate; Real Estate Management

Disbursements with funds to be rendered	Bribery Terrorist Financing	All Managers and Vice-Presidencies
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Risky Activity/Process	Crime Law 20.393	Vice President/Related Management
Obtaining permits for industrial waste deposit	Bribery	VP Oper. Mx and Real Estate; Real Estate Management; CSR Corp. Management; Sustainability Management
Obtaining sectoral environmental permits for plant construction.	Bribery	VP Oper. Mx and Real Estate; Real Estate Management; Sustainability Management
Obtaining municipal construction permits (of plants).	Bribery	VP Oper. Mx and Real Estate; Real Estate Management; Sustainability Management
Contracting of professional services (architects, lawyers, etc.) for plant construction.	Money Laundering Terrorist Financing	VP Oper. Mx and Real Estate; Real Estate Management

9.3 Policies for the prevention of bribery, money laundering and terrorist financing

Public Entities

"Workers and managers must not offer, promise, give or consent to give an economic benefit to a public or private employee who is Chilean or foreign, under any pretext or circumstance, or of any nature."

This policy is included as an integral part of Molymet's Organizational Values Policy and Molymet's Internal Order, Hygiene and Safety Regulations.

Any worker, executive or Director of Molymet who, in their relationship with the employees of public entities, has or believes they have a conflict of interest, is obliged to report the situations of conflict of interest identified in this regard, to the Molymet Crime Prevention Officer (See Annex II Form Persons Related to the Worker).

The Crime Prevention Officer must keep a record of the declarations of conflict of interest submitted by the workers, evaluating whether those who declare correspond to people who have positions of management, supervision, management of funds, among others, that could increase the risk of committing the crime of bribery, due to the decision-making power that the position entails. Likewise, it will evaluate, in cases where the conflict of interest corresponds to a family relationship with a public employee, whether the position of the public employee corresponds to one in which he could grant a benefit to Molymet by means of bribery.

If, after the evaluation described above, the Crime Prevention Officer determines that there is a conflict of interest, the worker must be disqualified from the relationship with the public entity involved.

Employee and Third Party Travel

It is prohibited to finance trips to national or foreign public employees with funds from Molymet or on behalf of it.

The per diems extended to a Molymet worker may not be used to make payments or invitations to public employees or to finance expenses incurred by them.

Invitations and Gifts to Employees of Public Entities

It is Molymet's policy to make gifts or invitations to customers or potential customers of the public sector or its employees, or to employees of any domestic or foreign public institution.

Exceptionally, the gifts granted must be approved by the corresponding managements, for which an authorization form may be used and they must be recorded in special accounting accounts for these purposes.

Fixed Fund

The Fixed Funds will be used only to cover minor expenses related to the normal and usual operation of the corresponding management (mobilization, fuel, tolls, and other minor expenses duly justified).

These funds may not be used to make invitations to public employees, or representation expenses, or for other purposes other than those indicated in the preceding paragraph.

Fixed Funds must be surrendered at least once a month. A person in charge must be defined, within the Finance Management, to monitor and demand that the funds be rendered with the frequency mentioned above.

Acceptance and Maintenance of Suppliers and Service Providers

Each time a relationship is initiated with a new supplier or service provider, it must be evaluated in relation to its alleged or proven link to the crimes of bribery, money laundering and terrorist financing.

The service provider/provider must make an affidavit in which he/she expresses that he/she is aware of the Policy on Organizational Values and of Molymet's policy on crime prevention contemplated by Law 20,393 and that in his/her actions he/she adheres to them in all their parts, stating, In addition, that your company has policies, procedures, and controls in place to prevent them (if applicable). This declaration must be signed before doing any business with the supplier/service provider.

The creation of the new supplier/service provider, its modification or elimination, will be entered into the supplier master by duly authorized personnel, who must be independent of who generates the payments or issues the bank transfer (or voucher).

For already accepted service providers, the evaluation indicated in the first paragraph must also be carried out periodically, at least once a year.

In the event that a Molymet worker has knowledge or suspicion that a supplier/service provider of the company could be linked to the commission of any of the crimes described in Law 20,393, this situation must be reported, through the complaint channel established by the company, to the Crime Prevention Officer.

The cases reported, according to the preceding paragraph, must be analyzed by the Prevention Officer, who will provide the Committee with the necessary background information so that it can define an action plan or decision (see VII). In the event that the committee determines that the provider/provider should no longer be operated with the

services, this must be blocked in the system and communicated to the corresponding areas.

The procedure for suppliers must include aspects that prevent the commission of crimes, considering, among others, the following:

- Request the Certificate of Background of the partners or owners of the provider/service provider.
- Verify suspicious situations in relation to the supplier/service provider, such as prices of products or services well below the market price.
- In the case of foreign suppliers, or their subsidiaries, obtain information on the risk of corruption from the supplier's country of origin (for example, Transparency International indexes, or review in blacklists).
- Develop and maintain a database of service providers/providers whose evaluation has been rejected because of their link to the aforementioned crimes, in order to avoid re-evaluating them.
- When a risky provider/service provider is identified, the Crime Prevention Officer must be informed about any suspicious situation of the commission of the crimes provided for in Law 20,393 by the provider/service provider, current or potential.
- Before establishing commercial relations with a supplier/service provider, a document will be used in which the supplier/service provider expressly declares that he/she is aware of the Policy on Organizational Values and of Molymet's policy on crime prevention contemplated in Law 20,393 and that in his/her actions he/she adheres to them in all their parts. Further stating that your company has policies, procedures, and controls in place to prevent them (if applicable). This document must be signed before conducting any business with the supplier/service provider. In the event of formalizing the commercial relationship through a contract, a clause must be incorporated into it with the declaration described above.

Customer Acceptance and Maintenance

Each time a relationship is initiated with a new client, the client must make an affidavit in which he or she expresses that he or she is aware of the Policy on Organizational Values and of Molymet's policy on the prevention of crimes contemplated in Law 20,393 and that in his or her actions he or she adheres to them in all their parts. Further stating that your company has policies, procedures, and controls in place to prevent them (if applicable). This declaration must be signed before doing any business with the client.

In addition, Molymet's new customer intake and customer maintenance workers will conduct an evaluation of the customers upon their entry as customers, which must also be conducted periodically, at least once a year. This evaluation will be carried out with the technological means that Molymet has for its workers, and it is not the responsibility of Molymet to carry out investigations that exceed the area of its attributions.

The evaluation of customers will be carried out in accordance with the guide "Indicative Warning Signs of Money Laundering or Money Laundering for the Financial System and Other Sectors" issued by the Unidad de Análisis Financiero (UAF). To this end, the person in charge of accepting and evaluating customers must consult this guide.

In addition, the evaluation of customers must be in accordance with the provisions of this section under the subheadings "Public Entities" and "Know Your Customer/Supplier".

In the event that Molymet personnel become aware, or suspect, that a customer may be risky in relation to the commission of any of the crimes described in Law 20,393, this situation must be reported, through the complaints channel, to the Crime Prevention Officer.

The cases reported, according to the preceding paragraph, must be analyzed by the Committee (see VII). In the event that the committee determines that the customer should no longer operate, it must be blocked in the system and communicated to the corresponding areas.

Molymet must maintain a database with information on clients (or applicants to clients) who have been rejected on suspicion or proof of involvement with crimes described in Law 20,393.

A specific clause must be stipulated under the contract in which the early termination of the contract is stipulated in the event that the client has links to terrorist acts or networks and/or money laundering.

Funds to Be Rendered

The Funds to be Surrendered will be used only to cover expenses related to the normal and usual operation of the corresponding management, such as advance on travel expenses, travel and others related to transfers.

These funds may in no case be used for illegal purposes and/or constitute a crime, such as terrorist financing, money laundering and bribery.

The Funds to be Surrendered must be surrendered within thirty days following the date on which they were granted, in accordance with the surrender procedures regulated by the Finance Management. There will be a person in charge, within the Finance Management, to monitor and demand that the funds be rendered with the frequency and formality mentioned above.

Cash Collections

The maximum amount to accept for cash collection is 25 U.F. The Crime Prevention Officer must be informed of the cash collections on said value.

Payments made in cash must be received in the Molymet Treasury department.

The Crime Prevention Officer will obtain a report from the system with the cases in which customers make payments to Molymet in cash, over the minimum amounts established. The Crime Prevention Officer will analyze these cases and determine if it is necessary to begin an investigation.

Corporate Credit Cards

Corporate credit cards will be used only to cover expenses incurred by the Executive Chairman related to business trips both within the national territory and abroad, including hotel expenses, transfers, food, among others, in addition to those related to invitations to members of the Board of Directors.

Corporate credit cards may not be used for any purpose other than those indicated in the preceding paragraph. The use of corporate credit cards for illicit or criminal purposes, such as terrorist financing, money laundering or bribery, is strictly prohibited.

The foregoing, without prejudice to the application of the Travel Policy that governs the respective approvals and rendering of associated expenses.

Donations

Donations shall not be delivered to institutions that are linked to the crimes mentioned in Law 20,393, when this link is publicly known.

The following obligations must be an integral part of the donation procedure:

- Set the authorization chain for donations
- Investigate the entity receiving the donation with the appropriate accreditations (legal validity, constitution, legal representatives, address, etc.).
- Define the person responsible for verifying the non-link of the receiving entity with the crimes mentioned in Law 20,393.
- Develop a database of organizations whose evaluation has been rejected because of their link to the crimes mentioned in Law 20,393 (or that are known through news in the press or from some other source, that they have such a link). The above in order to avoid evaluating it again.
- Verify the institution in the "Registro de Donatarios (Ley 19.885)".
- Set the maximum allowable donation amount
- Identify the work carried out in society by the institution receiving the donation.
- Establish the objective of the donation and the use of the resources donated by the company.
- Maintain a centralized registry of donations granted, which will associate their respective supports, such as analysis of the evaluation, authorizations, disbursement, photographs of the delivery (if applicable), among others.

- Define a Record Maintainer Listed Above
- Make it clear what type of in-kind donations are being granted.

The foregoing will be in accordance with the Donations Policy and the decisions that may be taken by the committee created to control and direct these items, in addition to complying with the current legal and tax regulations that regulate them.

"Know Your Customer/Supplier"

The "Know Your Customer" and "Know Your Supplier" policies must be implemented, which implies documenting information regarding the current and historical situation of customers and suppliers, including beneficiaries, intermediaries and interested parties, establishing for each case the purpose and nature of each relationship. In this way, it seeks to rule out possible links with terrorist or money laundering networks. In addition, this information must clearly identify whether the counterparty corresponds to a public sector entity or not, since, if it is, special care will be taken when dealing with its representatives (employees), in order to avoid committing any activity that could be related to the crime of bribery.

In addition, the type, volume and frequency of the activities of Molymet's clients must be documented and information must be obtained, when the amounts and characteristics of the situation warrant it, on the origin of the funds used by the client.

Staff who manage customer and supplier relationships are responsible for implementing the "know your customer" and "know your supplier" mechanisms, as appropriate.

Due safeguards must be taken to keep the information collected from customers safe, avoiding unauthorized access by third parties.

Payments with Funds from Bank Checking Accounts

Payments with funds from bank checking accounts will be made by electronic transfer or issuance of sight vouchers.

Payments by check will only be made on an exceptional basis. In case of payments made with checks, they must be issued by name and crossed. The issuance of bearer or to order (endorsable) checks is prohibited.

Extraordinarily, the Chief Executive Officer shall authorize the issuance of bearer checks, in cases in which, at his discretion, it warrants it.

Disbursements from a bank current account, whether through electronic transfer, sight vouchers or, exceptionally, the issuance of checks, must have a double signature. To this end, the current powers of signature will be considered with their respective approval limits.

It is prohibited to make payments for the commission of any of the crimes established in Law 20,393, namely, bribery, money laundering and financing of terrorism.

The person who issues and accounts for the disbursements of bank current accounts must be different from the person who signs them. Likewise, bank reconciliations must be carried out by personnel independent of the person who issues and signs the checks.

Control Measures Related to Workers

The company will maintain at all times a strict procedure for the selection and hiring of personnel, both for permanent and temporary positions. This procedure includes a verification of their criminal and employment records as to their potential relationship with the crimes of bribery, money laundering and financing of terrorism.

Molymet must have control mechanisms in place to detect indications of possible participation by any of the workers in the crimes established in Law 20,393. For this, the indications referred to in numeral 11 of the guide "Indicative Warning Signs of Money Laundering for the Financial System and Other Sectors" issued by the Unidad de Análisis Financiero (UAF), under the Ministerio de Hacienda, will be taken into consideration.

In the event of a suspicious situation, the actions indicated in chapter X "PROCEDURE FOR REPORTING NON-COMPLIANCE" must be followed.

Based on the analysis made by the Crime Prevention Officer, the corresponding investigations will be carried out, always respecting the regulations in force and the fundamental rights of the worker.

In the event that the participation of a worker in any act that could give rise to the crimes mentioned in Law 20,393 is proven, the measures indicated in chapter XI "ADMINISTRATIVE SANCTIONS" will be taken.

Worker Registration

Molymet will maintain, in addition to the background information already available in the file of each worker, a record that contains, at least, the following information related to the prevention of crimes stipulated in Law 20,393:

- Police and criminal record certificate
- Statement of having become aware of and committed to comply with the Policy on Organizational Values and the Crime Prevention Policy
- Training certificates
- Penalties for non-compliance with internal rules
- Background for investigations carried out for the commission or suspicion of the crimes contemplated in Law 20,393.

Buying and Selling Real Estate and Other Fixed Assets

Each time the process of buying or selling land or other fixed assets begins, the selling or buying entity must be evaluated, in order to avoid doing business with entities linked to terrorist activity or money laundering.

The transaction of purchase or sale of land or other fixed assets and the counterparty must be evaluated in relation to whether there is a suspicious situation of money laundering or terrorist financing, described in numeral 8 of the guide "Indicative Warning Signs of Money Laundering or Money Laundering for the Financial System and Other Sectors" issued by the Unidad de Análisis Financiero (UAF). If you are faced with a

suspect situation, the Crime Prevention Officer must be informed, through the reporting channel, who will analyze and manage the complaint received (for more details see 10.1 "Channels for reporting suspicious activities").

Evidence of the valuation made when buying/selling land or other fixed assets must be provided, including the determination of their price.

Disposal of Deregistered, Disused Fixed Assets and Scrap

The sale or donation of decommissioned assets must have a prior evaluation of the counterparty that receives the assets, in relation to their alleged or proven link to the crimes of bribery, money laundering and financing of terrorism.

The agreed procedures on the treatment of sales of disused assets and the sale of scrap metal will be followed to carry out these operations.

For the aforementioned evaluation, the aspects indicated in the "Customer Acceptance and Maintenance" policy or in the "Donations" policy, as appropriate, must be considered.

Commercial Agreements with Strategic Partners

The Due Diligence process carried out on potential business partners of Molymet, whether for the purposes of a strategic alliance, a joint-venture or a co-branding, must not only consider commercial and financial aspects, but must also analyze all the necessary information to detect a possible link of the external company with any of the crimes established in Law 20,393.

Investments

Investments in financial instruments made by Molymet must comply with the following controls, in order to prevent money laundering:

It is permitted to invest in financial products that are consistent with the Financial Risk Management Policy, approved by the Board of Directors and in relation to the decisions taken by the Risk Committee, created for this purpose.

It is prohibited to invest in countries that are not cooperative or sanctioned by the FATF/FATF, by the U.S. Department of the Treasury or State or in entities prohibited by the Excluded Parties Listed System (<https://www.epls.gov/>).

Investments will be made through a recognized trader that has preventive controls against money laundering within its policies. In addition, the trader must adhere to Molymet's policies in this regard.

Sensitive Products

There should be a list of products used or administered by Molymet, which are classified as precursor products and essential chemicals listed as likely to be used in the illicit manufacture of narcotic or psychotropic drugs.

The above-mentioned list should also include details of the products (or raw materials) considered to be an explosive chemical, explosive or explosive base.

The foregoing in order to prevent such products from being used for illicit purposes that may involve Molymet in the crime of money laundering or financing of terrorism.

Sensitive products must be stored with the due approval of the corresponding authority, and follow the safety, authorization and control protocols previously defined for this purpose.

It will be the function of the sensitive products committee to generate the procedures that control and administer these products correctly and safely.

X. NON-COMPLIANCE COMPLAINT PROCEDURE

Molymet expects its workers together with their managers to take responsible measures to prevent a breach of the Crime Prevention System, in order to seek guidance and raise situations in time, in order to prevent them from becoming problems. For this, it should be considered as a general principle that, in the event of doubts or suspicions regarding a possible violation of laws, this policy or others that the company has, all workers must communicate this situation through the formal channels that Molymet has to receive this type of report.

10.1 Suspicious activity reporting channels

Molymet has channels to report suspected violations of any domestic law or regulation. These channels allow the anonymity of the whistleblower.

Those complaints that are related to the crimes stipulated in Law 20,393 will be referred to the Crime Prevention Officer, who will analyze and manage such complaints, and may initiate an investigation in this regard, which must be carried out in a confidential manner.

In addition, the Prevention Officer will issue a report with the result of the investigation. This report will be confidential and will be delivered to the Ethics Committee, if established, so that it can determine the sanctions to be applied to the worker.

The reporting channels must be made known to all the company's workers, disseminated through the intranet and on posters placed in visible places. These channels must also be known by suppliers, customers and third parties, and formally communicated to them.

10.2 Mandatory use of whistleblowing channels

Suspected violations of national law, or of policies, rules and procedures held by the company dealing with any of the following matters, should be reported through the channels implemented by the company:

- An alleged bribery of a public employee.
- Knowledge or suspicion of links of any manager, worker, supplier, client or third party with terrorist activity or money laundering.

In addition, this channel will serve as guidance for the company's worker, in case they need to discriminate if they are facing a risk of committing any of the crimes stipulated in the law.

10.3 Handling of complaints

The Crime Prevention Officer is responsible for analyzing and managing the complaints received that are related to the crimes stipulated in Law 20,393, and will ensure that the necessary measures are taken for such complaints.

Complaints made about non-compliance with the Crime Prevention System must include the following aspects:

- The complainant must describe in detail the situation in which the transaction that gave rise to the complaint was known. Include the grounds on which the presumption of this possible unusual or suspicious operation or situation is based.
- If there is a beneficiary of the transaction, indicate their personal data.
- The communication should contain as much information as possible about the accused/suspect.
- The Prevention Officer will keep a confidential file with all the information received.

The administration of this whistleblowing channel could be outsourced to a company specialized in handling complaints, who must report to the person in charge of crime prevention.

10.4 Confidentiality of the complaint

Matters relating to suspected violations of legal regulations or Molymet's policies, rules and procedures will be treated confidentially.

XI. ADMINISTRATIVE SANCTIONS

All Molymet employees are responsible for being aware of the content of this policy and abiding by its guidelines at all times. The Crime Prevention Officer will monitor compliance with this Policy and implement verification programs.

Failure to comply with the terms of this Policy by workers will be cause for sanctions that can range from a warning to the dismissal of the worker.

Workers shall report violations observed in the Policy to their supervisors or the Crime Prevention Officer, or through the anonymous reporting mechanism established in this Policy.

Molymet employees should be aware that they may be subject to internal investigations, if there is any indication or a complaint has been received that is related to the non-compliance with any law or internal regulation of Molymet. Likewise, and according to the merit that the results of the investigation provide, a Molymet worker may be subject to fines, in order to compensate Molymet for the losses caused as a result of his fault.

The policies indicated in Molymet's Policy on Organizational Values and other internal provisions are mandatory and are incorporated into the functions and responsibilities assigned to each worker. Consequently, non-compliance entails the sanctions provided for in the Internal Regulations of Order, Hygiene and Safety, without prejudice to the corresponding civil and criminal sanctions.

Workers and all personnel in general, together with their executives and managers, must strictly comply with these instructions and carry out the controls with the greatest rigor, as it is a matter of special importance and care.

XII. TRAINING

In order for this policy to be integrated into the daily work of each worker, training will be carried out periodically in order to transmit the minimum necessary knowledge on the subject and the application of its procedures. The training of employees in prevention must be coordinated by the HR Management in conjunction with each department or management.

The training must include, at least, the following contents:

- Definition of the crimes of bribery, money laundering and financing of terrorism.
- Legislation on these matters: liability, sanctions, mitigating elements.
- Role of the Crime Prevention Officer.
- Warning signs, examples of risk situations of commission of these crimes.
- Specific prevention policies (e.g., travel, gifts, donations, payments, vendor acceptance, etc.).
- Internal regulations and regulations: Policy on Organizational Values, Internal Regulations of Order, Hygiene and Safety, among others.
- Necessary background information to know in the relationship with customers, suppliers, service providers and the company's workers.
- Reporting channels.
- Disciplinary sanctions, in the event of non-compliance with internal and external regulations on money laundering, terrorist financing and bribery.

All Molymet workers must receive at least one training every two years, which may be face-to-face or virtual, leaving a record of it.

XIII. AUDIT PROCEDURES

The Crime Prevention Officer shall determine specific audits to verify compliance with this policy and the operation of the controls implemented to mitigate the risk of committing the crimes established in Law 20.393. To this end, the Crime Prevention Officer shall define the scope of these audits together with the Corporate Internal Auditor. The latter must include them in the Annual Audit Plan and define the necessary audit elements, such as types of audits to be carried out, matters to be reviewed, frequency of audits, controls to be audited, etc.

All transactions that have given rise to an investigation into the commission of any of the offences identified in this policy shall be recorded. This record must be kept for a period of five (5) years.



EDGAR PAPE A.
CEO

ANNEX I Legal Glossary

Administration of the Legal Entity: According to Article 4 of Law 20,393, the "Administration of the Legal Entity" is the highest administrative authority of the legal entity, whether it is its board of directors, a managing partner, a manager, a principal executive, an administrator, a liquidator, its representatives, its owners or partners, as appropriate to the form of administration of the respective entity.

Bribery: According to Article 250 of the Chilean Criminal Code, an act of bribery is committed when a person offers or consents "to give a public employee an economic benefit, for the benefit of the latter or a third party, so that he or she performs the actions or incurs in the omissions indicated in Articles 248, 248 bis and 249, or for having carried them out or having incurred in them."

In addition, article 251 bis of the Chilean Criminal Code stipulates that an act of bribery is committed when a person offers, promises or gives "to a foreign public official an economic or other benefit, for the benefit of the latter or a third party, so that he or she performs an act or incurs an omission with a view to obtaining or maintaining it, for himself or another, of any undue business or advantage in the scope of any international transactions (...). Similarly, (...) anyone who offers, promises or gives the aforementioned benefit to a foreign public official for having carried out or incurred in the actions or omissions indicated.

Anyone who, in the same situations as those described in the previous paragraph, consents to give the aforementioned benefit."

Money Laundering: According to Article 27 of Law No. 19,913, the crime of money laundering is committed by "anyone who in any way conceals or conceals the illicit origin of certain assets, knowing that they come, directly or indirectly, from the perpetration of acts constituting any of the crimes contemplated in Law No. 19,366, which punishes the illicit trafficking of narcotic drugs and psychotropic substances; in Law No. 18,314, which determines terrorist conduct and establishes its penalty; in Article 10 of Law No. 17,798, on arms control; in Title XI of Law No. 18,045, on the securities market; in Title XVII of Decree No. 3 of 1997 of the Ministry of Finance, General Law on Banks; in paragraphs 4, 5, 6 and 9 bis of Title V of Book II of the Criminal Code and in articles 141, 142, 366 quarter, 367 and 367 bis of the Criminal Code; or, knowing that they are of such origin, conceals or conceals these assets.

Anyone who acquires, possesses, has or uses the aforementioned assets, for profit, when at the time of receiving them he or she has known their illicit origin."

The same article cited above, considers it a crime if the perpetrator of the conducts described in the first paragraph, "has not known the origin of the crimes due to inexcusable negligence".

Financing of Terrorism: According to Article 8 of Law 18,314, the crime of financing terrorist acts is committed by "anyone who, by any means, directly or indirectly, solicits, collects or provides funds for the purpose of using them in the commission of any of the terrorist crimes indicated in Article 2."

ANNEX II Worker-Related Persons Form

Worker Data	
ID	
NAME	
CHARGE	

Conflict of Interest Statement

ID	Names and Surnames	Type of Relationship with the Worker	Public Entity		
Indicate the full related person's ID with checker digit	Indicate full name	(spouse; grandparent; parent; child; grandchild; sibling)	Entity ID	Entity Name	Position held by the related person

Worker Signature