CRIME PREVENTION POLICY

Corporate Policy Version 1.0

OBJECTIVE

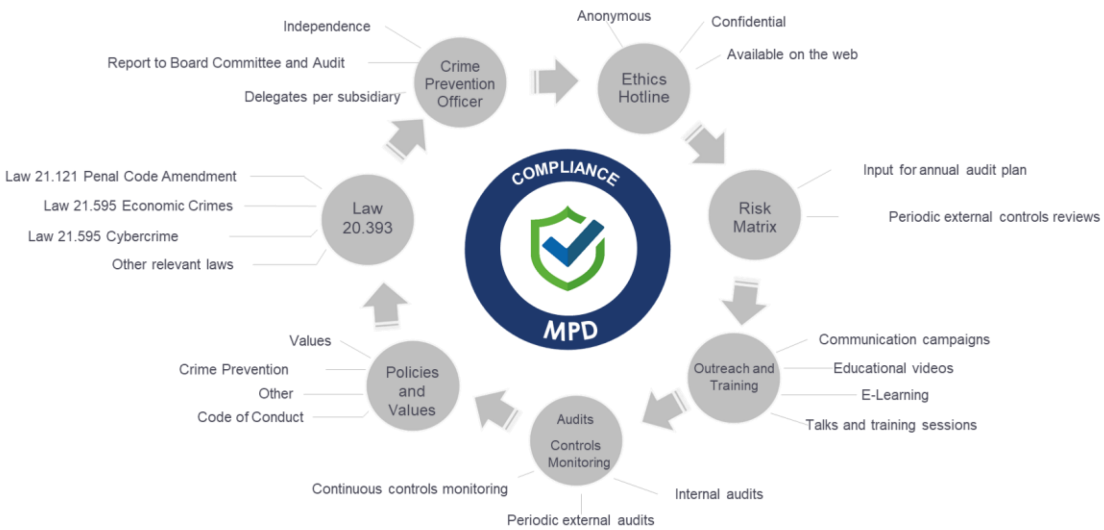
INTRODUCTION

This Crime Prevention Policy is intended to guide all employees of Molibdenos y Metales S.A. and its subsidiaries in Chile (hereinafter, Molymet) on how to prevent crimes and acts that violate the values upheld by Molymet in the various activities and processes carried out by the company during its operations. Compliance with these guidelines is in line with the objectives of Molymet's Crime Prevention Model, which has been designed to prevent illegal acts and promote integrity and ethics at Molymet and its subsidiaries.

Our culture of risk prevention and commitment to maintaining standards of excellence particularly those related to regulatory compliance—requires that all individuals in leadership, administrative, executive, supervisory and operational roles within the institution adhere to the guidelines and principles set forth in this policy.

That is why promoting ethical conduct in line with our values and integrity, and establishing clear guidelines and ensuring their acceptance, is the responsibility of everyone at Molymet.

In this regard, Molymet's Crime Prevention Model has various components to ensure that its objectives are met in a comprehensive and sustainable manner over time. The components of the Prevention Model are:



- Crime Prevention Officer
- Ethics Hotline
- Compliance Risk Matrix
- Communication and training programs
- Audits
- Continuous monitoring
- Policies and values
- Laws (Law No. 20.393) and other relevant legislation

Molymet requires all its employees including those in sales, operations and support functions to conduct themselves with integrity, honesty and diligence and to strictly comply with the rules and standards governing the conduct of Molymet and its subsidiaries, particularly those related to crime prevention. Responsibility in this area is shared by all employees.

Therefore, the conduct of all Molymet employees is governed by the following internal policies and definitions:

- Policies approved by the board of directors:
  - Policy on Organizational Values and Principles of Conduct
  - Conflict of Interest Policy

- Other policies and/or procedures:
  - Contributions and Donations Procedures
  - Public Official Interaction Policy
  - Internal regulations
  - Travel Procedure
  - General Customer Assessment Procedure
  - Procedure for Procurement, Services and Approval Workflow
  - Procedure for Expense Advances

- Other points of interest regarding the Crime Prevention Model:
  - Current legal regulations

This policy aims to establish a crime prevention framework by implementing a Crime Prevention Model that identifies risk areas and supports compliance with applicable internal policies and Chilean laws and regulations. As a result of the enactment of Law No. 20.393, the criminal liability of legal entities is defined as follows:

> *Section 3:*
> *Attribution of criminal liability. Legal entities shall be liable for the crimes set out in Article 1 that are committed directly and immediately, in their interest, or for their benefit by their owners, controllers, officers, senior executives, representatives or those performing management and supervisory functions, provided that the commission of the crime results from the entity's failure to fulfill its management and supervisory duties.*
> *Under the same conditions set out in the preceding paragraph, legal entities shall also be liable for crimes committed by persons under the direct management or supervision of those referred to in the preceding paragraph. The duties of management and supervision shall be deemed to have been fulfilled when, prior to the commission of the crime, the legal entity has adopted and implemented organizational, administrative and supervisory models to prevent crimes such as the one committed, in accordance with the provisions of the following section.*
> *Legal entities shall not be held liable in cases where the persons referred to in the preceding paragraphs have committed the crime solely for their own benefit or for the benefit of a third party.*

Consequently, this policy provides guidance and instructions to Molymet employees regarding measures designed to mitigate the risks faced by the company.
The crimes initially included in Law No. 20.393 on the Criminal Liability of Legal Entities are:

1. Money laundering

2. Terrorist financing
3. Bribery
4. Receiving stolen property

The following are also included:

5. Incompatible negotiations
6. Bribery between individuals
7. Misappropriation
8. Unfair administration

Finally, as relevant areas are identified, additional legal provisions are incorporated into the law on the criminal liability of legal entities, including the following:

9. Law 21,121 Amendment to the Penal Code and Other Statutes
10. Cybercrime Law
11. Law on Financial and Environmental Crimes

Law No. 21,595 on Financial and Environmental Crimes, enacted in late 2023, includes approximately 250 crimes drawn from various laws in force in Chile, including the Penal Code, the Tax Code, customs and intellectual property laws, as well as other legal frameworks such as corporate law, securities market regulations, the General Environmental Framework Act and competition law, among others.

SCOPE

This policy applies to Molymet's directors, managers, executives, suppliers, customers, service providers, contractors, subcontractors, representatives and temporary staff, as well as to domestic production subsidiaries that have implemented a crime prevention model, in accordance with applicable law. It also establishes mandatory guidelines for action and sets out requirements to be met under this document, including reporting lines, definitions of authority, independence and autonomy, and accountability for the performance of tasks and/or activities.

OWNER

Corporate Vice Presidency of Compliance and Risk

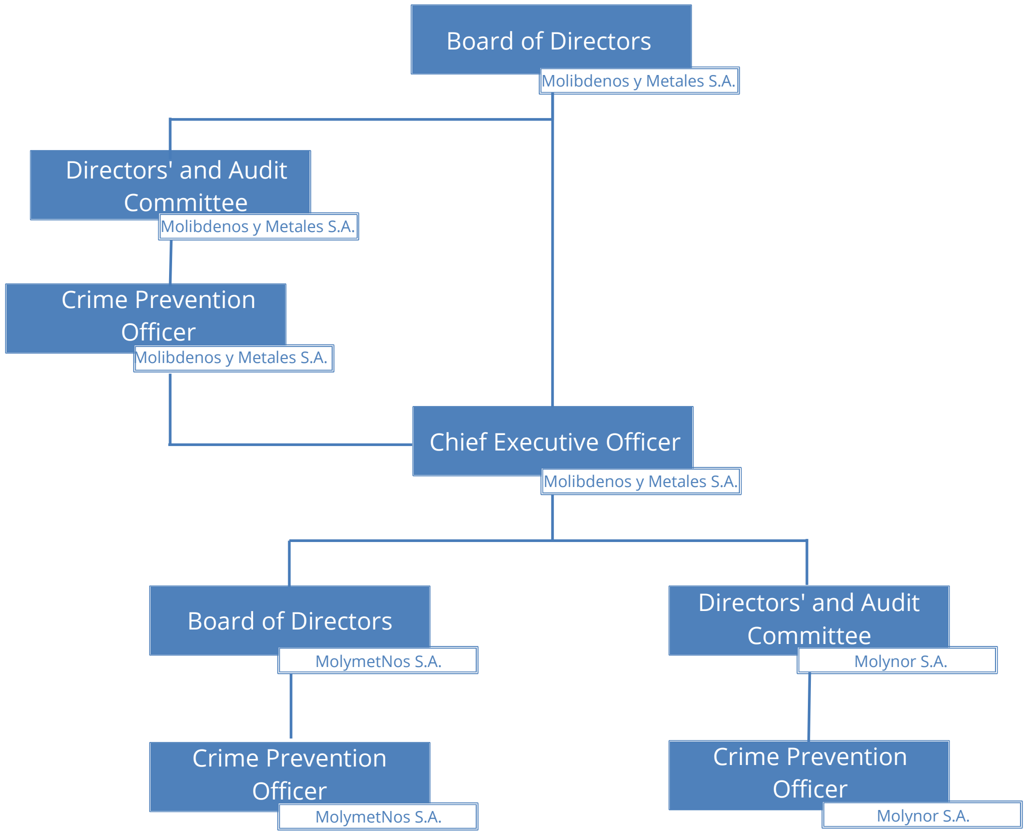
DESCRIPTION

GOVERNANCE OF THE CRIME PREVENTION MODEL

The Crime Prevention Policy defines the various responsibilities established under the prevention model implemented at Molymet and its subsidiaries, and is subject to approval by the board of directors of Molibdenos y Metales S.A. with respect to its objectives, scope and internal control design, and to periodically submitting its findings to the Corporate Crime Prevention Officer, including information from both the parent company and ad hoc reports from the relevant subsidiaries.

Each domestic production subsidiary must appoint a Crime Prevention Officer responsible for implementing the prevention model in accordance with this policy and the guidelines necessary for its proper operation. This must be carried out in coordination with the Corporate Crime Prevention Officer, and the subsidiary's Crime Prevention Officer must periodically report the results to the subsidiary's Board of Directors.

Each Crime Prevention Officer must report regularly to the Corporate Crime Prevention Officer so that the latter can compile the group's information, analyze it and coordinate corporate actions if necessary.



ELEMENTS OF THE CRIME PREVENTION MODEL.

The crime prevention model includes monitoring the applicable legal regulations in Chile, particularly Law No. 20,393 on the criminal liability of legal entities and all other legal provisions annexed to Law No. 20.393. This model also encompasses ethical and integrity-related aspects of business, which are addressed through policies, oversight activities and training programs for Molymet employees, deepening understanding of the legal provisions governing the prevention of such crimes and ensuring compliance with them. This also aims to ensure that every employee develops the necessary ability to detect unusual or suspicious transactions through adequate knowledge of the customer and their transactions

It should be noted that the foregoing is notwithstanding individual liability for the commission of any of the crimes referred to above, which will in any event be subject to legal prosecution.

With regard to Law No. 20.393 and related legislation, the Foreign Corrupt Practices Act (FCPA, USA, 1977) has served as a model worldwide; furthermore, anti-corruption measures and accurate accounting records have emerged as two of the most significant corporate governance issues in recent years, leading Chilean legislation to adapt to new requirements in these areas

CRIME PREVENTION OFFICER

The designated officer embodies, through their conduct, the company's values, such as ethics, commitment, responsibility and innovation. In addition, they have a thorough understanding of:

- The functions and the persons responsible for each area of the company.
- Legislation and regulations issued by legitimate and competent regulatory authorities.
- Molymet's Policy on Organizational Values, policies and procedures, regulations, and other internal guidelines.

As recorded in the minutes of the Board of Directors of Molibdenos y Metales S.A. from Meeting No. 840, on December 7, 2010, the current Corporate Vice President of Compliance and Risk was designated as the Crime Prevention Officer, in accordance with Article 4 of Law No. 20,393. This position will be held for a maximum of three years and may be renewed for successive three-year terms, subject to approval by the Board of Directors and formal record in the relevant minutes, as approved in each term.

The Crime Prevention Officer is responsible for:

- Ensuring that all departments at Molymet comply with the laws and regulations regarding the prevention of the aforementioned crimes.
- Reporting on their activities at least twice a year to the management of the legal entity (the Board of Directors of Molibdenos y Metales S.A.).
- Promoting appropriate procedures for preventing and controlling the crimes specified in Law No. 20.393.
- Verifying compliance with this policy and the Policy on Organizational Values to prevent misconduct in the daily work of employees. This may be carried out through documented delivery of the Policy on Organizational Values, by verifying that personnel are trained on these matters, and that reports exist regarding the reporting of breaches of the Policy on Organizational Values, among other measures.
- Launching an internal investigation when a report is filed or a suspicious situation warrants it and issuing a report on the matter.
- Gathering the necessary evidence, including computers or other data storage devices, to conduct the investigation.
- Requesting that, based on a prior assessment, the Chief Executive Officer or General Manager of the subsidiary suspend from their duties any individuals under investigation.
- Maintaining contact with the relevant authorities regarding matters covered by Law No. 20.393, reporting any cases that warrant such action.
- Keeping the Crime Prevention Policy up to date. And additionally, ensuring that the Policy on Organizational Values as well as the internal regulations or procedures are kept up to date in accordance with relevant changes in the country's laws.

- Identifying specific audits to verify compliance with this document. And additionally, agreeing on its scope and extent within the Corporate Internal Audit program.
- Reviewing the design and implementation of a training program on compliance with the Prevention System, aimed at employees of Molymet and its domestic subsidiaries

POWERS AND RESOURCES OF THE CRIME PREVENTION OFFICER

The resources necessary for the Crime Prevention Officer (CPO) to perform their duties properly are as follows:

- The position of Corporate Crime Prevention Officer is established, who will have responsibility as Crime Prevention Officer solely for the parent company, Molibdenos y Metales S.A.; however, this role will also perform a supervisory function over the reporting of the Crime Prevention Officers of domestic subsidiaries that have implemented a Prevention Model.
- The Corporate Crime Prevention Officer must promote the development of a Crime Prevention Model for all domestic subsidiaries, in accordance with the same standards implemented at the parent company.
- Regarding their responsibilities, each Crime Prevention Officer must:
  - Have direct access to the Legal Entity's Management to report on the performance of their duties.
  - Maintain independence from other vice-presidencies and/or departments in the case of subsidiaries.
  - Have a budget allocated for crime prevention initiatives (including a whistleblower channel, dissemination of the Prevention Model and the whistleblower channel and related training, etc.), as well as for carrying out compliance reviews of the Crime Prevention System.
  - Have a team of trained auditors to assist with oversight and monitoring of the Crime Prevention Model.
  - Have the necessary resources for the smooth performance of their duties, such as an office, a meeting room, a computer, etc.

DIRECTORS' AND AUDIT COMMITTEE

The Directors' and Audit Committee, in its ordinary meetings, serves as the forum where the Crime Prevention Officer presents matters relating to the audit scope and program, as well as the Crime Prevention Model. The Officer also reports on and analyzes cases investigated following reports received, as well as cases in which facts or situations are identified that do not comply with applicable external or internal regulations, including policies and procedures.

- Where the analysis concerns a current or potential supplier or customer, and the committee recommends that no business be conducted with such party, it must notify the relevant departments through the Crime Prevention Officer, and the supplier or customer must be blocked in the company's systems. In addition, the matter will be reported to the competent authority by the Crime Prevention Officer.
- In coordination with the Corporate Vice Presidency of Human Resources, define and apply administrative sanctions to any employee at any level, who, based on the merits of the evidence reviewed, has breached or failed to comply with the provisions of this policy, notwithstanding any judicial investigation that may be conducted in relation to the same matter.
- Notwithstanding the foregoing, the disciplinary action will be imposed on the employee by their immediate supervisor or by the Corporate Vice Presidency of Human Resources

BOARD OF DIRECTORS

The Board of Directors has the following responsibilities regarding crime prevention:

- Promote and foster ethical values within the company.
- Appoint the Crime Prevention Officer and define their resources and authority.
- Approve the Crime Prevention Policy.
- Review, analyze and provide guidance to management on how to proceed in cases investigated and reported by the Crime Prevention Officer, as well as on improvements to the model.

TRAINING

To ensure that this policy is integrated into employees' daily work, training sessions will be held on a regular basis to provide basic knowledge on the subject and how to apply its procedures. Training on crime prevention for employees will be coordinated by the Corporate Vice President of Human Resources in collaboration with the relevant departments or area.

The training must cover, at a minimum, the following topics:

- Definition of the crimes of bribery, money laundering, terrorist financing, receiving stolen property, and any others that may be added in the future.
- Legislation on these matters: liability, sanctions, mitigating factors.
- Role of the Crime Prevention Officer.
- Warning signs, examples of situations where these crimes may be committed.
- Specific prevention policies (e.g., travel, gifts, donations, payments, supplier approval, etc.).
- Internal regulations and policies: Policy on Organizational Values, Internal Rules on Order, Hygiene and Safety, among others.
- Essential supporting information regarding relationships with customers, suppliers, service providers and company employees.
- Whistleblower channels.
- Disciplinary sanctions for non-compliance with internal and external regulations relating to money laundering, terrorist financing, bribery, receiving stolen property, and any other crimes that may be incorporated in the future.

Every Molymet employee must complete at least one training session every two years; this may be in-person or online, and a record of it must be kept.

GENERAL GUIDELINES FOR THE CRIME PREVENTION MODEL

<u>Policies and Procedures</u>

All policies and procedures that establish definitions, regulations and controls for the Company's activities must be properly documented and made available to all employees who may be affected by them.

<u>Policy on Organizational Values</u>

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.

During their professional activities, Molymet employees must strictly comply with applicable laws, the Policy on Organizational Values and internal regulations. To this end, Molymet employees must be familiar with the relevant laws and regulations, understand them and operate in strict compliance with them.

Molymet requires all its employees to act with integrity and diligence and to strictly comply with the crime prevention guidelines set out in the applicable internal policy.

In particular, employees and their managers must not offer, promise, give or agree to give any financial benefit to a public or private sector employee—whether domestic or foreign—under any circumstances. This restriction includes, among other things, hotel stays, tickets for any form of transportation, commissions, bonuses, awards or profit-sharing, whether in cash or in kind, intended to benefit the company.

Code of Conduct:
Its purpose is to set forth the ethical principles that guide all of our institutional actions—from those that inspire our culture, business and the company's role in society, to all the standards that our employees must follow in their actions and decisions.

The Code of Conduct is not merely a set of rules governing employee behavior; it also serves as a guide to fostering relationships that always adhere to the highest ethical standards, and promoting best practices in all activities carried out by Molymet and its subsidiaries.

Applicable Law and Regulations:
All applicable laws and regulations governing the activities or operations of Molymet and its subsidiaries must be strictly observed, and all employees, executives and directors must conduct their activities in compliance with them.

Molymet's Crime Prevention Model was developed following the enactment of Law No. 20.393 on the Criminal Liability of Legal Entities to comply with legal requirements. Since then, the list of crimes covered by Law No. 20.393 has been expanded through other laws, such as Law 21.121, which amends the Penal Code and other legal statutes, and Law No. 21.459 on Cybercrime, among others. Law 21.595 on Financial and Environmental Crimes is especially significant due to its impact

Law No. 21.595 on Financial and Environmental Crimes classifies financial crimes and environmental offenses, amends various legal provisions defining crimes against the socioeconomic order and adjusts the applicable sanctions. It also introduces a set of tools to prevent the commission of various types of crimes and imposes stricter requirements on legal entities and their internal compliance systems. They also impose greater obligations on those who hold executive and managerial positions in companies.

This law addresses crimes related to various business activities, which is why Molymet and its subsidiaries have incorporated these crimes into their crime prevention model

Fraud and corruption crimes	Labor-related crimes against physical integrity
Antitrust crimes	Intellectual and industrial property
Tax crimes	Customs and international trade
General environmental crimes	Substances and waste

Water resources	Cybercrimes
Fishing and agriculture	Corporations
Labor and social security crimes	Capital markets

In relation to the sustainability that Molymet and its subsidiaries promote in their business and activities, we identify those crimes that harm the environment. Accordingly, a new Section XIII has been added to Title VI of Book Two of the Penal Code, entitled “Crimes Against the Environment.” The new section includes Articles 305 through 312, which comprehensively regulate crimes related to pollution and environmental damage through a system designed to operate in coordination with environmental administrative regulations.

These crimes are incorporated into the second category of financial crimes under this law and also become part of the crimes for which a legal entity may be held liable; accordingly, they must be included in its Prevention Model.

Employee Employment Contracts

All employment contracts must include the obligations, prohibitions and internal sanctions for the crimes set out in Law No. 20.393; therefore, they must contain clauses addressing the obligations and prohibitions related to the matters regulated by that law. These clauses must be included in an appendix to the employment contracts of existing employees.

Internal Rules on Order, Hygiene and Safety

The Internal Rules on Order, Hygiene, and Safety must include the obligations, prohibitions and internal sanctions for the crimes set out in Law No. 20.393. If special sanctions (for example, fines or termination of employment) are imposed on employees who fail to comply with the obligations established in relation to the Law, such sanctions must, in any case, be regulated in the Internal Rules on Order, Hygiene and Safety. The same will apply where procedures are established for investigating potential criminal conduct within the company. These procedures must be set out in the Internal Rules on Order, Hygiene and Safety, which must be reviewed considering the laws governing workers’ fundamental rights.

INTERNAL POLICIES AND DEFINITIONS FOR THE CRIME PREVENTION MODEL

“Employees and managers must not offer, promise, give or agree to give any financial benefit to a public or private sector employee—whether domestic or foreign——under any circumstances.”

This policy is incorporated as an integral part of Molymet’s Policy on Organizational Values and Molymet’s Internal Rules on Order, Hygiene and Safety.

Any Molymet employee, executive or director who, in their dealings with employees of domestic or foreign public entities, has or believes they may have a conflict of interest, must report such conflict to Molymet’s Crime Prevention Officer (see Public Official Interaction Policy).

In addition, the Crime Prevention Officer must maintain a record of the conflict of interest disclosures submitted by employees and must assess whether individuals concerned hold positions involving management, supervision or the handling of funds, among others, that may increase the risk of bribery due to their decision-making authority. They will also assess—in cases where a conflict of interest arises from a family relationship with a domestic or foreign public official—whether the public official holds a position in which they could confer a benefit on Molymet through bribery.

If, following the assessment described above, the Crime Prevention Officer determines that a conflict of interest exists, the employee must be removed from any dealings with the public entity in question.

Travel by Employees and Third Parties
As stated in this policy, it is prohibited to use Molymet funds or funds on behalf of Molymet to finance travel for domestic or foreign government officials.

Travel allowances issued to a Molymet employee may not be used to make payments to, extend invitations to or to cover the expenses of domestic or foreign public officials.

Invitations and Gifts to Employees of Domestic or Foreign Public Entities
As stated in Molymet's Policy on Organizational Values, it is prohibited to offer gifts or invitations to customers or potential customers in the public sector or their employees, or to employees of any domestic or foreign public institution.

In exceptional cases, gifts must be approved by the corresponding department. An authorization form may be used, and such gifts must be recorded in special accounts designated for this purpose.

Petty Cash
Petty cash, as governed by the relevant policy, must be used solely for the purchase of goods and services required for day-to-day operations, particularly low-value and unforeseen purchases related to the routine activities of the relevant department (e.g., transportation, fuel, tolls for company vehicles, office supplies and other minor expenses, as detailed in the corporate petty cash policy).

These funds may not be used to extend invitations to domestic or foreign public officials, for entertainment expenses, or for any purposes other than those specified in the preceding paragraph.

Petty cash must be reported weekly. A designated individual within the Finance Department must be appointed to monitor and ensure that financial reports are submitted at the stated intervals.

Approval and Management of Suppliers and Service Providers
Whenever a relationship is established with a new supplier or service provider, that entity must be assessed for any alleged or proven involvement in crimes such as bribery, money laundering, terrorist financing and receiving stolen property, as well as any other crimes that may be added in the future, all as detailed in the Procurement, Services and Authorization Policy.

The creation, modification or deletion of a new supplier or service provider must be entered into the supplier master file by duly authorized personnel, who must be independent of those responsible for processing payments or issuing wire transfers (or cashier's checks).

For suppliers and service providers who have already been approved, the assessment described in the first paragraph must also be conducted on a regular basis, in accordance with the procedure established therein.

If a Molymet employee becomes aware of or suspects that a company supplier or service provider may be involved in any of the crimes described in Law No. 20.393, this situation must be reported to the Crime Prevention Officer through the company's established whistleblower channel.

The cases reported, as described in the preceding paragraph, must be reviewed by the Crime Prevention Officer, who will provide the Directors' and Audit Committee with the necessary information to advise management on how to proceed and to establish an action plan or decision. If the committee recommends that business with the supplier or service provider should be discontinued, the supplier or service provider must be blocked in the system, and the relevant departments must be notified.

The supplier procedure must include measures to prevent the commission of crimes, including, among others, the following:

- Request a criminal background check for the partners or owners of the supplier or service provider.
- Require sworn statements regarding confidentiality, conflicts of interest, the crimes set out in Law No. 20.393 and other matters deemed relevant to the supplier approval process.
- Check for suspicious situations involving the supplier or service provider, such as product or service prices that are significantly below market rates.
- For foreign suppliers and their subsidiaries, obtain information on corruption risks in the supplier's country of origin (e.g., International Transparency indices or screening against blacklists).
- Create and maintain a database of suppliers and service providers whose assessments have been rejected due to their involvement in the aforementioned crimes, in order to avoid re-assessing them.
- When a high-risk supplier or service provider is identified, any situation involving a suspected commission of the crimes set out in Law No. 20.393 by the current or potential supplier or service provider must be reported to the Crime Prevention Officer.
- Before entering a business relationship with a supplier or service provider, a document must be signed in which the supplier or service provider expressly declares that they adhere to the Policy on Organizational Values and to Molymet's Policy on Crime Prevention as provided for in Law No. 20.393, and that it complies with all provisions of said law in its operations, further stating that the company has policies, procedures and controls in place to prevent such crimes (where applicable). This document must be signed before conducting any business with the supplier or service provider. If the business relationship is formalized by contract, the contract must include a clause reflecting the matters described above.

Customer Approval and Management

Whenever a relationship is established with a new customer, they must undergo a financial assessment in accordance with the procedure set out in the General Commercial Area Customer Assessment Policy. In addition, they must confirm that their company has policies, procedures and controls in place to prevent such conduct (if applicable). This statement must be signed prior to conducting any business with the customer.

In addition, Molymet staff responsible for approving and managing new customers will carry out an assessment when adding the customer, which must also be performed periodically, at least once a year. This assessment will be carried out using the technological resources that Molymet provides to its employees; Molymet is not responsible for conducting investigations that fall outside the scope of its authority.

Customer assessments must be carried out in accordance with the guidelines entitled "Indicative Red Flags of Money Laundering for the Financial System and Other Sectors," issued by the Financial Analysis Unit (UAF). To this end, the person(s) responsible for approving and assessing customers should consult this guide.

In addition, customer assessments must comply with the provisions set out in this section under the headings "Public Entities" and "Know Your Customer/Supplier."

If Molymet staff become aware of, or suspect, that a customer may pose a risk in connection with any of the crimes described in Law No. 20.393, they must report this situation to the Crime Prevention Officer through the whistleblower channel or other means.

The cases reported, as described in the preceding paragraph, must be reviewed by the committee (see VII). If the committee determines that business with the customer should be discontinued, the customer must be blocked in the system, and the relevant departments must be notified.

Molymet must maintain a database containing information on customers (or prospective customers) who have been rejected due to suspicion or evidence of ties to crimes described in Law No. 20.393.

The contract must include a specific clause providing for early termination if the customer has ties to terrorist acts/networks or money laundering

<u>"Know Your Customer/Supplier"</u>
The "Know Your Customer" and "Procurement" policies require documentation of information on the current and historical status of customers and suppliers, including beneficiaries, intermediaries and stakeholders, specifying the purpose and nature of each relationship. The aim is to rule out any possible ties to terrorist networks or money laundering operations. In addition, this information must clearly indicate whether the counterparty is a public sector entity or not. If it is, special care must be taken when dealing with its representatives (employees) to avoid engaging in any activity that could be construed as bribery.

In addition, Molymet must document the type, volume and frequency of its customers' activities and, when warranted by the amounts involved and the circumstances, obtain information regarding the source of the funds used by the customer.

Employees who manage relationships with customers and suppliers are responsible for implementing the "Know your Customer" and "Know your Supplier" procedures, as appropriate.

Appropriate precautions must be taken to ensure the security of customer data and to prevent unauthorized access by third parties.

Other red flags include service contracts in which the provider represents Molymet's interests, as well as service contracts in which the provider receives a percentage of the amounts handled—for example, in connection with efforts to reduce tax or property tax liabilities.

Expense Advances
Expense advances must be used solely to cover expenses incurred while conducting business on behalf of the Company, both domestically and abroad, provided that such expenses have been properly authorized, including per diem, travel and other transportation-related expenses.

Under no circumstances may these advances be used for illegal purposes or for activities that constitute a crime, such as terrorist financing, money laundering, bribery, receiving stolen property or any other such activities that may be added in the future.

Expense advances must be reconciled within thirty days of the date on which they were granted, in accordance with the accounting procedures established by the Finance Department. A designated individual within the Finance Department will be responsible for monitoring and ensuring that financial reports are submitted with the frequency and in the manner described above.

Cash Collections
The maximum amount accepted for cash payments is 25 Unidades de Fomento (UF). Cash receipts exceeding that amount must be reported to the Crime Prevention Officer.

Cash payments must be made to Molymet's Treasury Department.

Corporate Credit Cards
Corporate credit cards will be used solely to cover expenses incurred by the Chief Executive Officer in connection with business travel both within the country and abroad, including hotel, transportation and meal expenses, among others, as well as those related to invitations extended to members of the Board of Directors.

The cards assigned to the Vice Presidency of Administration and Finance and the Deputy Manager of Administration and Procurement at MolymetNos are intended for purchasing tickets and reimbursing expenses, respectively.

Corporate credit cards may not be used for any purpose other than those specified in the preceding paragraph. The use of corporate credit cards for illegal or criminal purposes, such as terrorist financing, money laundering or bribery, and other crimes covered by Law No. 20.393, is strictly prohibited.

The foregoing is notwithstanding application of the Travel Policy governing the approval and reconciliation of travel-related expenses.

Donations
In accordance with the key guidelines of the Contributions and Donations Policy, no donations must be made to institutions that have ties to the crimes referred to in Law No. 20.393, where such ties are publicly known.

The following requirements must be an integral part of the donation process:

- Establishing the approval process for making donations.
- Verifying the recipient organization's credentials (legal validity, incorporation, legal representatives, address, etc.).
- Designating a person responsible for verifying that the receiving entity has no ties to the crimes listed in Law No. 20.393.
- Creating a database of organizations whose assessments have been rejected due to their ties to the crimes listed in Law No. 20.393 (or whose ties to such crimes have come to light through press reports or other sources). This is to avoid having to assess them again.
- Setting the maximum donation amount allowed.
- Identifying the societal role of the organization receiving the donation.
- Establishing the purpose of the donation and the use of the funds donated by the Company.
- Maintaining a centralized record of donations made, including relevant supporting documentation, such as assessment reports, authorizations, disbursement records and photographs of the handover (where applicable), among others.
- Appointing a person responsible for maintaining the aforementioned record.
- Clearly specifying what type of in-kind donation is being made.
- Not contracting services from entities to which a donation has previously been made, in accordance with applicable legal requirements.

This is consistent with the Donations Policy and any decisions made by those responsible for overseeing and managing these funds. It also complies with the applicable legal and tax regulations governing them.

Payments from Checking Accounts

Payments from checking accounts will be made via electronic transfer or by issuing cashier's checks.

Payments by check will only be accepted in exceptional cases. If payments are made by check, such checks must be issued for deposit only and payable to a named payee. The issuance of bearer checks or checks payable to order (endorsable) is prohibited.

In exceptional cases, the Chief Executive Officer may authorize the issuance of bearer checks when, in their discretion, such action is warranted.

Payments made from a checking account—whether by electronic transfer, cashier's checks, or, in exceptional cases, by check—must be signed by two people. To this end, current signing authorities and their respective approval limits will be taken into account.

It is prohibited to make payments for the purpose of committing any of the crimes set out in Law No. 20.393, namely bribery, money laundering, terrorist financing, receiving stolen property and other crimes included in Law No. 20.393.

The person who authorizes and records disbursements from checking accounts must be different from the person who signs them. In addition, bank reconciliations must be performed by personnel independent of those responsible for issuing and signing the checks.

Employee-Related Control Measures

The company will always maintain a strict employee selection and hiring process, for both permanent and temporary positions. This process includes a review of their employment history to determine whether they are potentially tied to crimes such as bribery, money laundering, terrorist financing, receiving stolen property and any other crimes that may be added in the future.

Molymet must have control mechanisms in place to detect any signs that an employee may be involved in the crimes defined in Law No. 20.393. For this purpose, consideration must be given, among others, to the indicators in section 11 of the guidelines entitled "Indicative Red Flags of Money Laundering for the Financial System and Other Sectors," issued by the Financial Analysis Unit (UAF) under the Ministry of Finance.

If a suspicious situation is encountered, the steps set out in Chapter 6, "PROCEDURE FOR REPORTING NONCOMPLIANCE" should be taken.

Based on the analysis conducted by the Crime Prevention Officer, the appropriate investigations will be initiated, always in accordance with applicable regulations and the fundamental rights of the employee.

If it is determined that an employee has been involved in any act that could constitute one of the crimes listed in Law No. 20.393, the measures set out in Chapter 7, "ADMINISTRATIVE SANCTIONS," will be taken.

Employee Records

In addition to the information already contained in each employee's file, Molymet will maintain a record including, at a minimum, the following information relating to the prevention of crimes set out in Law No. 20.393:

- Employment history.
- Declaration of having taken note of and undertaken to comply with the Policy on Organizational Values and the Crime Prevention Policy.
- Training records.
- Sanctions for failing to comply with internal policies.
- Records of investigations conducted in connection with the commission or suspected commission of crimes set out in Law No. 20.393.

Purchase and Sale of Real Estate and Other Fixed Assets

Whenever the process of purchasing or selling land or other fixed assets is initiated, the selling or purchasing entity must be assessed in order to avoid engaging in business with entities tied to terrorist activities, money laundering, receiving stolen property and other activities that may be added in the future.

The purchase or sale transaction involving real estate or other fixed assets, as well as the counterparty, must be assessed to determine whether there are any indicators of suspicious money laundering or terrorist financing activities, as described in section 8 of the guidelines entitled "Indicative Red Flags of Money Laundering for the Financial System and Other Sectors," issued by the Financial Analysis Unit (UAF). If a suspicious situation is identified, it must be reported through the whistleblower channel to the Crime Prevention Officer, who must review and manage the report.

Evidence of the assessment carried out in connection with the purchase or sale of real estate or other fixed assets must be retained, including the determination of their price.

Disposal of Decommissioned or Obsolete Fixed Assets and Scrap
Sales or donations of decommissioned assets must be preceded by an assessment of the recipient regarding their alleged or proven ties to crimes of bribery, money laundering, terrorist financing, receiving stolen property and other crimes covered by Law No. 20.393.

The procedures established for the sale of obsolete assets and scrap will be followed in carrying out these transactions.

For the aforementioned assessment, the aspects set out in the "Customer Approval and Management" policy or the "Donations" policy, as applicable, will be considered.

Commercial Agreements with Strategic Partners
The due diligence process conducted on Molymet's potential business partners—whether for the purpose of a strategic alliance, a joint venture, or a co-branding arrangement—must not only take into account commercial and financial aspects but also analyze all necessary information to identify any potential ties between the external company and any of the crimes established under Law No. 20.393.

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

Investment in financial products is permitted provided that such investments are consistent with the Financial Risk Management Policy approved by the Board of Directors and aligned with the decisions adopted by the Risk Committee established for such purposes.

Investing in countries that are non-cooperative or subject to sanctions by the FATF, the U.S. Department of the Treasury, or the U.S. Department of State, as well as in entities listed in the Excluded Parties Listed System *(https://www.epls.gov/)*, is prohibited.

The investments must be made through a reputable trader that has anti-money laundering controls in place as part of its policies. In addition, the trader must comply with Molymet's policies.

Sensitive Products
A list must be maintained of the products used or handled by Molymet that are classified as precursor chemicals or essential substances and are considered susceptible to use in the illicit manufacture of narcotic or psychotropic drugs.

The aforementioned list must also include details of products (or raw materials) classified as chemicals susceptible to explosion, explosives or explosive precursors.

This is to prevent such products from being used for illegal purposes that could implicate Molymet in money laundering or terrorist financing.

Sensitive products must be stored with the proper approval from the relevant authority and in accordance with the safety & security, authorization, and control protocols previously established for this purpose.

The Sensitive Products Committee is responsible for establishing procedures to properly and safely control and manage these products.

Conflicts of interest

In accordance with Molymet's Policy on Organizational Values and Principles of Conduct, as well as the Code of Conduct, every employee of Molymet and its subsidiaries must disclose any conflict of interest whenever they believe there is a conflict between their own interests and those of the organization. They must report the situation to their supervisor, the Corporate Vice Presidency of Compliance and Risk, and the appropriate HR department.

The disclosure of conflicts of interest will be a large-scale process for the Chilean subsidiaries of Molibdenos y Metales S.A. The Compliance Department within the Corporate Vice Presidency of Compliance and Risk will be responsible for coordinating these large-scale disclosure processes. The update period for each large-scale conflict of interest disclosure will be two years. Regardless of any large-scale disclosure process, each employee may disclose conflicts of interest whenever necessary.

The forms containing the conflict of interest disclosure must be attached or linked to each employee profile managed by the Corporate Vice Presidency of Human Resources and Communications.

For the purposes of the Conflict of Interest Policy applicable to senior management, situations giving rise to a conflict of interest are understood to include not only those involving the personal interests of the individual concerned, but also those involving entities or businesses in which they participate or represent an interest, as well as the interests of their close relatives (including spouses and relatives up to the second degree by blood or marriage), persons with whom any of them have entered into a civil union, and individuals with whom they share a household.

AUDIT PROCEDURES

The Crime Prevention Officer must establish specific audits to verify compliance with this policy and the operation of the controls implemented to mitigate the risk of committing the crimes set out in Law No. 20.393. For this purpose, the Crime Prevention Officer will define the scope of these audits in collaboration with the Corporate Vice Presidency of Compliance and Risk team in order to include them in the Annual Audit Plan and determine the necessary audit elements, such as the types of audits to be conducted, the areas to be reviewed, the frequency of the audits, the controls to be audited, etc.

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

ETHICS HOTLINE

Molymet encourages employees to report misconduct or ethical violations using various tools and resources designed specifically for this purpose. In the event of any questions or concerns, or if it is necessary to report a breach of the Code of Conduct, the matter should first be raised with the employee's direct supervisor. In the event of conduct that may violate ethical standards, integrity or applicable regulations, the Company's Ethics Hotline is available, where instructions will be provided on how to submit a report through the platform *(https://molymet.ines.cl/molymet/formulario/)*.

The Ethics Hotline is a confidential whistleblower channel that follows established protocols for handling information to ensure its integrity and proper use. This channel is available to all subsidiaries of the group, as well as to individuals and the company's stakeholders, as matters involving them are also of interest.

RISK MATRIX

Molymet's compliance model includes a process for identifying and assessing risks using internationally recognized risk management methodologies, such as COSO and ISO standards. Compliance risk management activities are directly related to both internal and external regulatory compliance, as well as to the principles, values, and ethical standards to which Molymet is committed.

PROCEDURE FOR REPORTING NON-COMPLIANCE

Molymet expects its employees to take responsible steps to prevent any failure to comply with the Crime Prevention System in collaboration with management, by seeking guidance and raising concerns in a timely manner to prevent them from escalating into problems. For this purpose, generally, if there are any doubts or suspicions regarding a possible violation of laws, this policy or other company policies, all employees must report the situation through the formal channels established by Molymet for receiving such reports.

Whistleblower Channels for Suspicious Activity

Molymet has channels in place for reporting suspected violations of any law or internal policy. These channels allow the whistleblower to remain anonymous.

Reports that are related to the crimes set out in Law No. 20.393 will be referred to the Crime Prevention Officer, who will review and handle these reports, and may launch an investigation into the matter, which must be conducted confidentially.

In addition, the Crime Prevention Officer will issue a report containing the results of the investigation. Such report will be treated as confidential and, if applicable, sanctions will be determined by the Ethics Committee.

Whistleblower channels must be made known to all company employees and should be publicized via the intranet and on posters displayed in visible locations. Suppliers, customers and third parties must also be made aware of these channels through formal notification.

Mandatory Use of Whistleblower Channels

Any suspected violations of domestic law, or of the company's policies, rules and procedures regarding any of the following matters, must be reported through the channels established by the company:

- Alleged bribery of a national or foreign public official.

- Knowledge or suspicion of any ties between an executive, employee, supplier, customer or third party and terrorist activities, money laundering, receiving stolen property or other activities that may be added in the future.

In addition, this channel will serve as guidance for company employees in cases where they need to determine whether they are facing risk of commission of any of the crimes established in the law.

Handling of Reports

The Crime Prevention Officer is responsible for reviewing and processing reports received regarding crimes covered by Law No. 20.393 and will ensure that the necessary measures are taken in response to such reports.

Reports of non-compliance with the Crime Prevention System must include the following information:

- The whistleblower must provide a detailed description of the circumstances under which the transaction that gave rise to the report came to light. Include the grounds on which the presumption regarding this potential transaction or unusual or suspicious situation is based.
- If there is a beneficiary of the transaction, their personal information must be provided.
- The report must include as much information as possible about the accused or suspect.
- The Crime Prevention Officer will maintain a confidential file containing all the information received.

The administration of this whistleblower channel can be outsourced to a company specializing in report handling, which would report to the Crime Prevention Officer.

Report Confidentiality

Matters involving suspected violations of legal regulations or Molymet's policies, standards and procedures will be treated confidentially.

ADMINISTRATIVE SANCTIONS

Every Molymet employee is responsible for familiarizing themselves with the contents of this policy and always adhering to its guidelines. The Crime Prevention Officer will monitor compliance with this policy and implement verification programs.

Any failure to comply with the terms of this policy by employees will result in sanctions, which may range from a written warning to termination of employment.

Employees must report any violations of this policy to their supervisors, 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 of, or a report of, a failure to comply with applicable laws or Molymet's internal policies. Furthermore, depending on the findings of the investigation, Molymet employees may be subject to fines in order to compensate Molymet for the losses incurred because of the employee's misconduct.

The policies set out in Molymet's Policy on Organizational Values and other internal regulations are mandatory and form part of the duties and responsibilities assigned to each employee. Consequently, failure to comply will result in the penalties set out in the Internal Rules on Order, Hygiene and Safety, notwithstanding any applicable civil or criminal penalties. All employees and staff, including executives and managers, must strictly adhere to these instructions and carry out the necessary checks with the utmost rigor, as this is a matter of particular importance and requires special care.

RESPONSIBILITIES

Board:	- Approve the policy.
Corporate Vice Presidency of Compliance and Risk	- Monitor policy compliance. - Implement the policy. - Update the policy. - Comply with defined controls.
All employees of Molymet and its subsidiaries	Comply with policy guidelines.

VALIDITY

VALIDITY:
Effective as of October 2024.

REVIEW:
Annual.

REFERENCE TO OTHERS REGULATORY DOCUMENTS

- Organizational Values Policy
- Code of Conduct
- Donations
- Know Your Customer
- Purchases of goods and services, and Approval Pathway
- Law 20.393 Criminal Liability of Legal Entities

POLICY COMMUNICATION CHANNELS

Platform Documentary Management of Policies and Procedures “(GDPP)”

This policy was approved by the Board of Directors of Molibdenos y Metales S.A. at Meeting No. 1026, held on October 15, 2024, and has been in effect since that date.

P.P.

EDGAR PAPE ARELLANO
Chief Executive Officer
Molibdenos y Metales S.A.

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APPENDIX I Legal Glossary of Crimes Identified in the Prevention Model

Management of the Legal Entity: According to Article 4 of Law No. 20.393, the "Management of the Legal Entity" refers to the highest administrative authority of the entity, whether its board of directors, managing partner, manager, chief executive officer, administrator, liquidator, representatives, or owners or partners, depending on the entity's governance structure.

Prevention System: A set of measures designed to prevent the company's employees from becoming involved in any illegal activity related to money laundering, terrorist financing and/or bribery, for which the company could be held liable. The minimum measures the system must include are: identification of activities or processes that generate or increase the risk of criminal activity; the establishment of specific protocols, rules and procedures to prevent the commission of crimes; identification of procedures for the management and audit of financial resources to prevent their use in crimes; and the existence of internal administrative sanctions and procedures for reporting or pursuing financial liability against individuals who violate the crime prevention system.

Suspicious Transaction: Any act, operation, or transaction that, in accordance with the customary practices of the relevant industry, is unusual or lacks any apparent financial or legal justification, whether it occurs on an isolated basis or repeatedly.

Bribery: Giving, or consenting to give, a financial benefit (also known as a kickback) to a domestic or foreign public official, for the benefit of such official or a third party, in order to induce the official to perform an act or omit an act in connection with their duties. Examples of financial benefits include funding travel, giving gifts or invitations or providing cash.

According to Article 250 of the Penal Code, an act of bribery is committed when a person offers or agrees "to give a public official a financial benefit, for the official's own benefit or that of a third party, in order for the official to perform or omit acts specified in Articles 248, 248 bis and 249, or for having performed or committed them."

Furthermore, Article 251-bis of the Penal Code stipulates that an act of bribery is committed when a person offers, promises or gives "a foreign public official a financial or other benefit, for the official's own benefit or that of a third party, in order for the official to perform or omit an act with a view to obtaining or maintaining, for themselves or another, any undue business or advantage in the context of any international transactions (...). Similarly, (...) anyone who offers, promises or provides the aforementioned benefit to a foreign public official in exchange for performing or omitting an act as described above.

Anyone who, in circumstances similar to those described in the preceding paragraph, agrees to provide the aforementioned benefits."

Money Laundering: The provision, whether direct or indirect, of funds to be used in the commission of terrorist crimes.
The concealment of the illicit origin of property or activities, or their acquisition, possession or use, with the intent to make them appear legitimate, knowing that they derive from the commission of a crime.

According to Article 27 of Law No. 19.913, a person commits the crime of money laundering "if they in any way conceal or disguise the illicit origin of certain property, knowing that they derive, directly or indirectly, from the commission of acts constituting any of the crimes set out in Law No. 19.366, which penalizes the illicit trafficking of narcotics and psychotropic substances; in Law No. 18.314, which defines terrorist acts and establishes their sanctions; in Article 10 of Law No. 17.798, on the control of weapons; in Title XI of Law No. 18.045, on the securities market; in Title XVII of Decree with Force of Law No. 3 of 1997, of the Ministry of Finance, General Banking Law; in Paragraphs 4, 5, 6, and 9 bis of Title V of Book II of the Penal Code and in Articles 141, 142, 366-quater, 367, and 367-bis of the Penal Code; or, knowing of such origin, conceals or disguises such property.

Any person who acquires, possesses, holds or uses the aforementioned property for profit, while being aware of their illicit origin at the time of receipt.

The same article cited above considers it a crime if the perpetrator of the acts described in the first paragraph "was unaware of the origin of the crimes due to inexcusable negligence."

Terrorist Financing: The provision, whether direct or indirect, of funds to be used in the commission of terrorist crimes.

According to Article 8 of Law No. 18.314, a person commits the crime of financing terrorist acts "if, by any means, directly or indirectly, they solicit, collect or provide funds for the purpose of using them in the commission of any of the terrorist crimes listed in Article 2.".

Receiving Stolen Proptery[1]: Any person who, knowing its origin or where it cannot reasonably be unknown, possesses, on any grounds, property that has been stolen, taken or obtained through livestock theft, receiving stolen property or misappropriation; or who transports, purchases, sells, transforms or otherwise commercializes such property in any manner, even if they have already disposed of it.

According to Article 456 bis A of the Criminal Code, any person who, knowing its origin or where it cannot reasonably be unknown, possesses, on any grounds, property that has been stolen, taken or obtained through livestock theft, receiving stolen property or misappropriation; or who transports, purchases, sells, transforms or otherwise commercializes such property in any manner, even if they have already disposed of it.
In determining the applicable penalty, the court will take into account, in particular, the value of the items as well as the seriousness of the crime through which they were obtained, if the offender was aware of this.

Incompatible Negotiations[1]: According to Article 240 of the Penal Code, paragraphs 6 and 7 state the following:

- (6) Any person entrusted with the safekeeping or management of all or part of the assets of another person who is unable to administer them, who directly or indirectly has an interest in any negotiation, act, contract, transaction or management matter in which they are required to participate in connection with such assets, in violation of the conditions established by law.
- (7) The director or manager of a corporation that takes a direct or indirect interest in any negotiation, action, contract, transaction or procedure involving the corporation in violation of

the conditions established by law, as well as any person to whom the rules governing the duties of directors or managers of such corporations apply.

According to Article 240 of the Penal Code, (1) a public official who, directly or indirectly, takes an interest in any negotiation, act, contract, transaction or procedure in which they are required to participate by virtue of their office. (2) Any arbitrator or commercial liquidator that takes a direct or indirect interest in any negotiation, act, contract, transaction, or procedure in which they are required to participate in connection with the assets, property, or financial interests whose distribution, division or administration is under their responsibility. (3) A trustee or liquidator in an insolvency proceeding that takes a direct or indirect interest in any negotiation, act, contract, transaction or procedure in which they are required to participate in connection with the assets or financial interests whose safeguarding or promotion is under their responsibility. In this case, the provisions of Article 465 of this Code will apply. (4) Any expert that takes a direct or indirect interest in any negotiation, act, contract, transaction or procedure in which they are required to participate in connection with the assets or items whose appraisal they are responsible for. (5) Any guardian or executor that takes a direct or indirect interest in any negotiation, act, contract, transaction or procedure in which they are required to participate in connection with the assets of the wards or the estates under their care, in violation of the conditions established by law. (6) Any person entrusted with the safekeeping or management of all or part of another person's assets—where that person is unable to administer them—who takes a direct or indirect interest in any negotiation, action, contract, transaction or procedure in which they are required to participate in connection with those assets, in violation of the conditions established by law. (7) The director or manager of a corporation that takes a direct or indirect interest in any negotiation, action, contract, transaction or procedure involving the corporation in violation of the conditions established by law, as well as any person to whom the rules governing the duties of directors or managers of such corporations apply.

The same penalties will be imposed on the persons listed in the preceding paragraph if, under the same circumstances, they allow or permit their spouse or domestic partner, or a relative in any degree of the direct line or up to and including the third degree of the collateral line, whether by blood or marriage, to take an interest, when they are required to prevent such action.
The same will apply where any of the persons listed in the first paragraph, under the same circumstances, grant or allow an interest to be taken, where they are required to prevent it, by third parties associated with them or with the persons referred to in the preceding paragraph, or by companies, associations or enterprises in which they, such third parties or those persons exercise management in any capacity or hold an ownership interest, which must exceed ten percent in the case of a corporation.

Bribery Between Individuals[1]: Any employee or agent that requests or agrees to receive an economic or other benefit, for themselves or a third party, to favor or for having favored in exercising their duties the contracting of one bidder over another will be penalized with medium-term imprisonment in the medium degree and a fine of double the benefit requested or accepted. If the benefit is of a non-financial nature, the fine will range from fifty to five hundred monthly tax units.

Anyone who gives, offers or consents to give an employee or agent an economic or other benefit, for themselves or a third party, to favor or for having favored the contracting of one bidder over another will be punished with medium-term imprisonment in the medium degree, in the case of giving or offering a benefit, and with medium-term imprisonment in the minimum degree, in the case of consenting to a benefit. In addition, the offender will be subject to the fines specified in the preceding section.

Misappropriation[1]: According to Article 470, paragraph 1, of the Penal Code: Anyone who, to the detriment of another, appropriates or embezzles money, property or any other tangible item that they have received in custody, on commission or under management, or under any other circumstances that create an obligation to deliver or return it.
For proof of deposit in the case referred to in article 2,217 of the Civil Code, the provisions of that article will be followed.

Unfair Administration[1]**:** According to Article 470, paragraph 11, of the Penal Code, any person who, having responsibility for the safekeeping or management of another person's assets, or any part thereof—by virtue of law, authority order, or an act or contract—causes damage to such assets, whether by abusively exercising powers to dispose of them or to bind the owner, or by performing or omitting any action in a manner manifestly contrary to the interests of the asset holder.
If the crime involves the assets of a person for whom the perpetrator serves as trustee, guardian or executor, or of an incapacitated person for whom the perpetrator is responsible in some other capacity, the maximum or highest degree of the penalties set our in Article 467 will apply.
If the assets in question belong to a public or special corporation, any administrator who engages in any of the acts described in the first paragraph of this section, thereby causing harm to the corporate assets, will be subject to the penalties set out in Article 467, increased by one degree. In addition, a temporary special ban from serving as a manager, director, liquidator or administrator in any capacity for a company or entity subject to supervision by a Superintendency or the Financial Market Commission will be imposed at its minimum degree. In all such cases, a fine ranging from half to the full amount of the defrauded value will also be imposed.

Crimes Under Law No. 21.595: Financial and Environmental Crimes: This legal framework systematizes financial and environmental crimes, amends various laws that define crimes against the socioeconomic order and adjusts the applicable penalties. The law defines financial crimes that are inherently financial in nature and those that become financial under certain circumstances (those committed while holding a position in a company or those committed by a public official at the request of a person holding a position within a company, such as in cases of bribery). In addition, the law incorporates environmental crimes into the category of financial crimes.

This law combines a set of measures designed to prevent various types of crimes and imposes stricter requirements on legal entities and their internal compliance systems. They also impose greater obligations on those who hold executive and managerial positions in companies.

Categories of Crimes:
For classification purposes, the law establishes four categories of crimes to determine whether they qualify as financial crimes.

1. First-category crimes are crimes specifically related to violations of the conditions of the country's prevailing financial and market system. They include, among others, violations concerning the securities market, banking crimes, and corporate law crimes.

2. Second-category crimes are crimes classified as “financial” when they are committed while performing a duty, function or position within a company, or when they are committed for the benefit of the company. Examples include tax and environmental crimes.

3. Third-category crimes are crimes considered financial in nature when committed by a public official, if someone acting in an official capacity, role or position within a company—or for the benefit of such a company—was involved; examples include embezzlement of public funds or bribery.

4. Fourth-category crimes are money laundering and receiving stolen property when they are based on an underlying crime classified as a financial crime.

Reform of the General Sentencing System
This law establishes changes to the determination of sentences regarding aggravating and mitigating circumstances. For crimes classified as “financial,” aggravating factors specifically designed to address financial crimes will apply; these factors are graded (simple and very serious) to allow for different impacts on the determination of penalties, depending on their severity. These aggravating and mitigating factors establish a special alternative enforcement system, the determination and amount of fines, and special disqualifications.

Environmental Crimes: According to Article 305 of Title VI of the Penal Code, Subsection XIII, any person who, while being aware of the obligation to do so, fails to submit their activity to an environmental impact assessment will be punished with imprisonment in its minimum to medium degree if they discharge pollutants into maritime or continental waters; withdraw continental waters, whether surface or groundwater, or maritime waters; discharge or deposit pollutants into the soil or subsoil, whether continental or maritime; deposit earth or other solid materials in wetlands; withdraw components from the soil or subsoil; or release pollutants into the air.
The penalty will be minor imprisonment in its medium to maximum degree if the offender commits the act while being required to submit their activity to an environmental impact assessment.

According to Article 306 of the same title and section, the penalties set out in the first paragraph of the preceding article will also apply to any person who, having authorization to discharge, release or withdraw any of the substances or elements referred to in numbers 1 to 6 of Article 305, engages in any of the acts described therein in contravention of an emission or environmental quality standard, in breach of the measures established in a prevention, decontamination or environmental management plan, in breach of an environmental qualification resolution, or of any condition associated with the granting of such authorization, provided that the offender has been administratively sanctioned in at least two separate sanctioning proceedings for serious or very serious violations within the ten years preceding the punishable act, and that such violations were committed in relation to the same unit subject to regulatory oversight.

According to Article 308 of the same title and section, any person who, by discharging, depositing or releasing polluting substances, or by withdrawing waters or components from the soil or subsoil, seriously affects maritime or continental waters, whether surface or groundwater, the soil or subsoil, whether continental or maritime, or the air, or who thereby seriously affects animal or plant health, the availability of water resources, or the supply of drinking water, or who seriously affects wetlands by depositing earth or other solid materials therein, will be punished with medium-term imprisonment in its minimum degree, provided that such serious harm is

committed under the circumstances set out in Articles 305, 306, or 307. Or with a sentence ranging from minor imprisonment in its maximum degree to medium-term imprisonment in its minimum degree in cases not covered by the preceding provision, provided that the person is not authorized to carry out such conduct.
According to Article 310 of the same title and section, any person who seriously affects one or more environmental components of a wilderness reserve, a national park, a natural monument, a national reserve or a wetland of international importance will be punished with medium-term imprisonment in its minimum degree.

The same penalty will be imposed on any person who, in breach of an environmental qualification resolution or without having submitted their activity to an environmental impact assessment when required to do so, seriously affects a glacier. The penalty will be minor imprisonment in its maximum degree if any of the acts referred to in the preceding paragraphs is committed through recklessness, or through negligence or lack of due care in violation of applicable regulations.
According to Article 311 of the same title and section, in relation to the acts described in Articles 305, 306, or 307, the penalty will consist solely of a fine of one hundred twenty to twelve thousand monthly tax units, where the quantity discharged, released or withdrawn in excess does not significantly exceed the permitted or authorized limit, taking into account the characteristics of the substance and the condition of the environment that may be affected by such excess, and provided that the offender has acted with due diligence to restore emissions or withdrawals to the permitted or authorized level and to prevent the harmful consequences of the act.
The court may impose a fine lower than the amount specified, starting at one monthly tax unit, when the crime involves the withdrawal of inland, surface or groundwater, the condition set forth in paragraph 1 is met, and the withdrawal was intended for drinking water and domestic subsistence purposes.

APPENDIX II Conflict of Interest Disclosure for Individuals

DECLARACION JURADA
Conflicto de Interés

Yo,____________________________, Cédula de identidad N°___________, con domicilio en,________________________comuna de________________, ciudad de__________, declaro con esta fecha, no poseer vínculos de negocios y/o parentesco, este último de tipo sanguíneo como por afinidad (político), con Directores, Ejecutivos, Representantes y Colaboradores de Molibdenos y Metales S.A. y sus filiales.

Como también declaro no poseer vínculos de negocios y/o relación familiar, sanguínea o por afinidad ni cualquier tipo de relación con asesores y empresas que se vinculen comercialmente con Molymet y sus filiales, del mismo modo, con funcionarios de entidades públicas a cargo de autorizaciones y/o fiscalizaciones asociadas Molymet y sus filiales.

En tanto y por el contrario, declaro las siguientes excepciones:

Relación de parentesco internas con directores, ejecutivos, representantes y colaboradores:

Empresa (Molymet o Filial)	Nombre y cargo persona relacionada	Relación de Parentesco

Relación de parentesco externas con proveedores, contratistas, prestadores de servicio, asesores, clientes, y funcionarios públicos:

Empresa Externa	Nombre y cargo persona relacionada	Relación de Parentesco

Declaración de negocios con ejecutivos, representantes, colaboradores, clientes, contratistas u proveedores.

Nombre del negocio	Rubro del negocio	Nombre, cargo y empresa de la persona con quien se mantiene negocios

Otros:

Relevantes de declarar no incluidas en los recuadros anteriores:

Empresa	Nombre y cargo persona relacionada	Tipo de relación

Además, declaro expresamente tener conocimiento de las políticas vigentes de la compañía y desempeñar mis funciones y deberes siempre en el marco de estas.

Atentamente:

________________ FIRMA

________ FECHA

APPENDIX III Process and Risk Matrix by Company

III.a Molibdenos y Metales S.A.

Processes and activities that pose a risk to Molymet in relation to the crimes of bribery, money laundering, terrorist financing, receiving stolen property, incompatible negotiations, bribery between individuals, misappropriation and unfair administration.

	Risk-Related Activity/Process	Relevant Vice Presidency and/or Department
Bribery	Inspections conducted by public agencies in general, such as labor, tax and financial agencies, as well as those related to corporate governance and local municipal authorities, among others.	- Vice Presidency of Finance - Vice Presidency of Human Resources and Communications - Vice Presidency of Corporate Affairs and Sustainability
	Customs procedures related to import and export activities	- Commercial Vice Presidency
	Investment projects and new business ventures	- Vice Presidency of Development
	Invitations, trips and gifts to third parties using personal or organizational funds.	- All areas of Molymet Corporate - Vice Presidency of Finance
	Business relationships with state-owned enterprises	- Commercial Vice Presidency
	Allocation and management of petty cash	- Vice Presidency of Finance
	Purchase or sale of land and/or real estate	- Vice Presidency of Corporate Affairs and Sustainability
Money laundering	Acquisition of land, real estate or other assets	- Vice Presidency of Corporate Affairs and Sustainability
	Unjustified income	- Vice Presidency of Finance
Terrorist financing	Granting of donations	- Vice Presidency of Corporate Affairs and Sustainability - Vice Presidency of Finance - Vice Presidency of Human Resources and Communications

	Risk-Related Activity/Process	Relevant Vice Presidency and/or Department
	Approval and management of suppliers and service providers	- All areas of Molymet Corporate
	Approval and management of raw material suppliers and customers	- Commercial Vice Presidency
	Sale of finished products to countries, companies, or individuals on the list of entities prohibited from conducting business	- Commercial Vice Presidency
Receiving stolen property	- n/a	- n/a
Incompatible negotiations	Management of financial matters and financial investments	- Vice Presidency of Finance
	Business and Investment Decisions	- Vice Presidency of Development - Commercial Vice Presidency - Vice Presidency of Finance
	Decision-making involving a clear conflict of interest	- All areas of Molymet Corporate
Bribery between individuals	Customs procedures related to import and export activities	- Commercial Vice Presidency
	Investment projects and new business ventures	- Vice Presidency of Development
	Invitations, trips and gifts to third parties using personal or organizational funds.	- All areas of Molymet Corporate - Vice Presidency of Finance
	Commercial negotiations for the purchase and sale of raw materials	- Commercial Vice Presidency
	Allocation and management of petty cash	- Vice Presidency of Finance
	Purchase or sale of land and/or real estate	- Vice Presidency of Corporate Affairs and Sustainability
	Purchase of goods or services	- All areas of Molymet Corporate
	Hiring in exchange for favors	- Vice Presidency of Human Resources and Communications
Misappropriation	Purchase or lease of land and/or real estate	- Vice Presidency of Corporate Affairs and Sustainability
	Development of third-party technology or software	- Vice Presidency of Finance

	Risk-Related Activity/Process	Relevant Vice Presidency and/or Department
	Third-party intellectual property	- Vice Presidency of Corporate Affairs and Sustainability - Research and Development Department
	Procurement of raw materials	- Commercial Vice Presidency
Unfair administration	Failure to exercise due care in the Company's financial situation	- Vice Presidency of Finance
	Negligent management of cash flows, debt positions or other factors that negatively impact Molymet's financial position	- Vice Presidency of Finance
	Terms agreed upon during negotiations for the purchase of raw materials	- Commercial Vice Presidency
	Terms agreed upon in negotiations for the sale of finished goods	- Commercial Vice Presidency
	Amendment of contractual terms for the purchase of raw materials and the sale of finished products	- Commercial Vice Presidency
	Failure to comply with formally agreed-upon fines and sanctions	- Commercial Vice Presidency
	Investments in companies	- Vice Presidency of Development
	Self-allocation of bonuses or pay increases	- Vice Presidency of Human Resources and Communications
	Self-allocation of bonuses or allowances	- Board of Directors
	Drafting of self-contracts or simulated contracts	- Vice Presidency of Human Resources and Communications
	Promotion of business activities that benefit a third party	- Board of Directors
Cybercrimes	Attacks on the integrity of strategic financial, accounting, payment and other systems	- Vice Presidency of Finance
	Unauthorized access to information systems	- Vice Presidency of Finance
	Unauthorized interception of information systems	- Vice Presidency of Finance
	Attack on the integrity of computer data	- Vice Presidency of Finance
	Computer-based data falsification	- Vice Presidency of Finance
	Illegal content obtained from third parties	- Vice Presidency of Finance

	Risk-Related Activity/Process	Relevant Vice Presidency and/or Department
	Computer fraud involving legal documents such as invoices, shipping documents, legal reports and financial and accounting records	- Vice Presidency of Finance
Labor, social security and physical integrity crimes	Crimes related to compliance with labor laws and associated regulations.	- Human Resources and Communications Sub-department
Fraud and corruption crimes	Crimes related to compliance with labor laws and associated regulations.	- All areas of MolymetNos
Tax crimes	Crimes related to risks in tax calculations.	- Vice Presidency of Finance
Intellectual and industrial property	Crimes related to market regulation.	- Research and Development Department
Customs and international trade	Crimes related to foreign trade.	- Commercial Vice Presidency
Antitrust, corporations and capital markets	Crimes related to market regulation.	- Vice Presidency of Corporate Affairs and Sustainability

III.b MolymetNos S.A.

Processes and activities that pose a risk to MolymetNos in relation to the crimes of bribery, money laundering, terrorist financing, receiving stolen property, incompatible negotiations, bribery between individuals, misappropriation and unfair administration.

	Risk-Related Activity/Process	Relevant Vice Presidency and/or Department
Bribery	Inspections conducted by public agencies in general, such as those related to labor, the environment, waste management, construction, personal safety and operational permits, among others.	- Human Resources Department - Engineering Department - Operations Department - HSEQ Department
	Invitations, trips and gifts to third parties using personal or organizational funds.	- All areas of MolymetNos
	Allocation and management of petty cash	- Finance and Administration Department
Money laundering	Unjustified income	- Finance and Administration Department
	Approval and management of suppliers and service providers	- Finance and Administration Department
	Cash receipts (property rentals)	- Finance and Administration Department
Terrorist financing	Granting of donations	- HSEQ Department
	Approval and management of suppliers and service providers	- Finance and Administration Department
	Sulfuric acid inventory management: production, purchasing, storage, sales and use.	- Finance and Administration Department - Operations Department
	Handling of precursors for explosives and/or narcotics	- Operations Department
Receiving stolen property	Approval of scrap metal suppliers	- Pyrometallurgy Department - Operations Department
	Approval of suppliers of materials and spare parts	- Operations Department - Finance and Administration

	Risk-Related Activity/Process	Relevant Vice Presidency and/or Department
		Department
Incompatible negotiations	Decision-making involving a clear conflict of interest	- All areas of MolymetNos
	Procurement of goods and services	- All areas of MolymetNos
Bribery between individuals	Contracting construction work with contractors	- Finance and Administration Department
	Negotiation of service contracts and/or the purchase of supplies or materials.	- Finance and Administration Department - Operations Department - Pyrometallurgy Department - Hydrometallurgy Department - Engineering Department
	Hiring in exchange for favors	- Human Resources Department
Misappropriation	Equipment leasing	- Finance and Administration Department - Operations Department - Pyrometallurgy Department - Hydrometallurgy Department - Engineering Department
	Permits and/or concessions for water resources	- General Manger, MolymetNos - Operations Department
	Third-party intellectual property	- Operations Department
	Procurement of supplies and materials	- Finance and Administration Department - Operations Department
Unfair administration	Failure to exercise due care in the Company's financial situation	- Finance and Administration Department
	Negligent management of cash flows, debt statements or other factors that negatively impact MolymetNos's financial position	- Finance and Administration

	Risk-Related Activity/Process	Relevant Vice Presidency and/or Department
		Department
	Terms agreed upon during negotiations for the purchase of supplies or materials	- Finance and Administration Department
	Amendment of contractual terms for the purchase of supplies or materials	- Finance and Administration Department
	Failure to comply with formally agreed-upon fines and sanctions	- Finance and Administration Department
	Self-allocation of bonuses or pay increases	- Human Resources Department
	Drafting of self-contracts or simulated contracts	- Human Resources Department
Crimes related to waste and disposal	Activity conducted without required environmental assessments/permits (EIA/RCA)	- HSEQ Department
	Failure to comply with any condition associated with the granting of the authorization	- HSEQ Department
	Pollutants are dumped, deposited or released in unauthorized locations, seriously affecting water, soil or air.	- HSEQ Department
	Violations of regulations governing the handling of hazardous waste; disposal of hazardous waste without the required permits; handling or disposal of waste without testing its contamination levels.	- HSEQ Department
	Withholding information in environmental impact assessments; handling hazardous waste internally without the required permits	- HSEQ Department
	Artificial fragmentation of the project to circumvent the environmental impact assessment system	- HSEQ Department
	False or incomplete waste reporting submitted to the Environmental Superintendency (SMA)	- HSEQ Department
	Failure to comply with sanctions or measures imposed by the Environmental Superintendency (SMA)	- HSEQ Department
	Preventing or obstructing the SMA's inspection activities	- HSEQ Department
	Forgery or fraudulent use of certificates, labels, or tags issued by the SMA.	- HSEQ Department
Cybercrimes	Attacks on the integrity of production, quality control, and financial or	- Operations Department

	Risk-Related Activity/Process	Relevant Vice Presidency and/or Department
	environmental reporting systems.	
	Unauthorized access to information systems	- Operations Department
	Unlawful inception of information systems.	- Operations Department
	Attack on the integrity of computer data.	- Operations Department
	Computer-related data falsification	- Operations Department
	Illegal content obtained from third parties	- Operations Department
	Computer-related fraud involving legal documents such as invoices, shipping documents, and legal and environmental reports.	- Operations Department
Environmental crimes (air, water, land)	Activity conducted without required environmental assessments/permits (EIA/RCA)	- HSEQ Department
	Failure to comply with any condition associated with the granting of the authorization	- HSEQ Department
	Pollutants are dumped, deposited or released in unauthorized locations, seriously affecting water, soil or air.	- HSEQ Department
	Withholding information in environmental impact assessments; handling hazardous waste internally without the required permits	- HSEQ Department
	Artificial fragmentation of the project to circumvent the environmental impact assessment system	- HSEQ Department
	False or incomplete waste reporting submitted to the Environmental Superintendency (SMA)	- HSEQ Department
	Failure to comply with sanctions or measures imposed by the Environmental Superintendency (SMA)	- HSEQ Department
	Preventing or obstructing SMA inspection activities	- HSEQ Department
	Forgery or fraudulent use of certificates, labels or markings issued by the SMA.	- HSEQ Department
Labor, social security and physical integrity crimes	Crimes related to compliance with labor laws and associated regulations.	- Human Resources and Communications Sub-department

	Risk-Related Activity/Process	Relevant Vice Presidency and/or Department
Fraud and corruption crimes	Crimes related to compliance with labor laws and associated regulations.	- All areas of MolymetNos
Tax crimes	Crimes related to risks in tax calculations.	- Vice Presidency of Finance
Intellectual and industrial property	Crimes related to market regulation.	- Research and Development Department
Customs and international trade	Crimes related to foreign trade.	- Commercial Vice Presidency
Antitrust, corporations and capital markets	Crimes related to market regulation.	- Vice Presidency of Corporate Affairs and Sustainability

III.c Molynor S.A.

Processes and activities that pose a risk to Molynor in relation to the crimes of bribery, money laundering, terrorist financing, receiving stolen property, incompatible negotiations, bribery between individuals, misappropriation and unfair administration.

	Risk-Related Activity/Process	Relevant Vice Presidency and/or Department
Bribery	Inspections conducted by public agencies in general, such as those related to labor, the environment, waste management, construction, personal safety and operational permits, among others.	- Human Resources Sub-department - Engineering Department - Operations Department - HSEQ Sub-department
	Invitations, trips and gifts to third parties using personal or organizational funds.	- All areas of Molynor
	Allocation and management of petty cash	- Administration and Finance Sub-department
Money laundering	Unjustified income	- Administration and Finance Sub-department
	Approval and management of suppliers and service providers	- Administration and Finance Sub-department
	Cash receipts (property rentals)	- Administration and Finance Sub-department
Terrorist financing	Granting of donations	- HSEQ Sub-department
	Approval and management of suppliers and service providers	- Administration and Finance Sub-department
	Sulfuric acid inventory management: production, purchasing, storage, sales and use.	- Administration and Finance Sub-department - Operations Department
	Handling of precursors for explosives and/or narcotics	- Operations Department
Receiving stolen property	Approval of suppliers of materials and spare parts	- Operations Department - 3Administration and Finance Sub-department
Incompatible	Decision-making involving a clear conflict of interest	- All areas of Molynor

	Risk-Related Activity/Process	Relevant Vice Presidency and/or Department
negotiations	Procurement of goods and services	- All areas of Molynor
Bribery between individuals	Contracting construction work with contractors	- Administration and Finance Sub-department - All areas of Molynor
	Negotiation of service contracts and/or the purchase of supplies or materials.	- Administration and Finance Sub-department - Operations Department - Engineering Department
	Hiring in exchange for favors	- Human Resources Sub-department
Misappropriation	Equipment leasing	- Administration and Finance Sub-department - Operations Department - Engineering Department
	Marine water resource permits and/or concessions	- HSEQ Sub-department - Operations Department
	Third-party intellectual property	- Operations Department
	Procurement of supplies and materials	- Administration and Finance Sub-department - Operations Department
Unfair administration	Failure to exercise due care in the Company's financial situation	- Administration and Finance Sub-department
	Negligent management of cash flows, debt positions or other factors that negatively impact Molynor's financial position	- Administration and Finance Sub-department
	Terms agreed upon during negotiations for the purchase of supplies or materials	- Administration and Finance Sub-department
	Amendment of contractual terms for the purchase of supplies or materials	- Administration and Finance Sub-department

	Risk-Related Activity/Process	Relevant Vice Presidency and/or Department
	Failure to comply with formally agreed-upon fines and sanctions	- Administration and Finance Sub-department
	Self-allocation of bonuses or pay increases	- Human Resources Sub-department
	Drafting of self-contracts or simulated contracts	- Human Resources Sub-department
Crimes related to waste and disposal	Activity conducted without required environmental assessments/permits (EIA/RCA)	- HSEQ Sub-department
	Failure to comply with any condition associated with the granting of the authorization	- HSEQ Sub-department
	Pollutants are dumped, deposited or released in unauthorized locations, seriously affecting water, soil or air.	- HSEQ Sub-department
	Violation of regulations governing the management of hazardous waste; disposal of hazardous waste without the required permits.	- HSEQ Sub-department
	Withholding information in environmental impact assessments; handling hazardous waste internally without the required permits	- HSEQ Sub-department
	Artificial fragmentation of the project to circumvent the environmental impact assessment system	- HSEQ Sub-department
	False or incomplete waste reporting submitted to the (SMA)	- HSEQ Sub-department
	Failure to comply with sanctions or measures imposed by the SMA	- HSEQ Sub-department
	Preventing or obstructing SMA inspection activities	- HSEQ Sub-department
	Forgery or fraudulent use of certificates, labels or markings issued by the SMA.	- HSEQ Sub-department
Cybercrimes	Attacks on the integrity of production, quality control, and financial or environmental reporting systems.	- Operations Department
	Unauthorized access to information systems	- Operations Department
	Unlawful inception of information systems.	- Operations Department
	Attack on the integrity of computer data.	- Operations Department
	Computer-related data falsification	- Operations Department
	Illegal content obtained from third parties	- Operations Department
	Computer-related fraud involving legal documents such as invoices, shipping	- Operations Department

	Risk-Related Activity/Process	Relevant Vice Presidency and/or Department
	documents, and legal and environmental reports.	
Environmental crimes (air, water, land)	Activity conducted without required environmental assessments/permits (EIA/RCA)	- HSEQ Sub-department
	Failure to comply with any condition associated with the granting of the authorization	- HSEQ Sub-department
	Pollutants are dumped, deposited or released in unauthorized locations, seriously affecting water, soil or air.	- HSEQ Sub-department
	Withholding information in environmental impact assessments; handling hazardous waste internally without the required permits	- HSEQ Sub-department
	Artificial fragmentation of the project to circumvent the environmental impact assessment system	- HSEQ Sub-department
	False or incomplete waste reporting submitted to the (SMA)	- HSEQ Sub-department
	Failure to comply with sanctions or measures imposed by the SMA	- HSEQ Sub-department
	Preventing or obstructing SMA inspection activities	- HSEQ Sub-department
	Forgery or fraudulent use of certificates, labels or markings issued by the SMA.	- HSEQ Sub-department
Labor, social security and physical integrity crimes	Crimes related to compliance with labor laws and associated regulations.	- Human Resources and Communications Sub-department
Fraud and corruption crimes	Crimes related to compliance with labor laws and associated regulations.	- All areas of MolymetNos
Tax crimes	Crimes related to risks in tax calculations.	- Vice Presidency of Finance
Intellectual and industrial property	Crimes related to market regulation.	- Research and Development Department
Customs and international trade	Crimes related to foreign trade.	- Commercial Vice Presidency
Antitrust, corporations and	Crimes related to market regulation.	- Vice Presidency of Corporate Affairs and Sustainability

	Risk-Related Activity/Process	Relevant Vice Presidency and/or Department
capital markets		