

BOARD OF DIRECTORS /GENERAL MANAGEMENT	ANTI-CORRUPTION POLICY	Code: BVN-POLAC-C003 Version 03
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<i>Date: April 29, 2021</i>	<i>Date: April 29, 2021</i>	<i>Date: April 29, 2021</i>

<i>Amendments with respect to the previous version</i>
<p>- Update of reference to criminal legislation, Law No.30424, amendments and Regulations, as well as SBS Resolution No. 789-2018 and new crimes regulated in the Peruvian Criminal Code: Private Corruption and Prohibited Financing of Political Parties.</p>

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1. Introduction

Compañía de Minas Buenaventura S.A.A. and subsidiaries (hereinafter "Grupo Buenaventura" or "the Company"), is a company with more than 66 years of activity in Peru, covering its scope to eight departments and with more than 3,000 collaborators throughout its organization, who are committed to ensuring that all activities, operations, transactions, negotiations and acts carried out or of which it participates in the territory of Peru or outside it, are carried out in strict compliance with the legal provisions in force, including anti-corruption, anti-bribery and prevention of money laundering and terrorist financing provided for in the Criminal Code of Peru, DL No. 1106; Law No. 27693, its amendments and supplements; SBS Resolutions No. 6115-2011, No.8930-2012, No. 4349-2016 and No. 789-2018; the Law regulating the administrative liability of legal entities Law No.30424, DL No. 1352, Law No. 30835 and D.S. 002-2019 Regulations of the Law, as well as the provisions of the Foreign Corrupt Practices Act of the United States known by its acronym "FCPA" (15 U.S.C. §§ 78dd-2, et seq.) and other applicable U.S. regulations, as well as its amendments respective (hereinafter and jointly, the "Compliance Laws"). Likewise, this Anti-Corruption Policy follows the general guidelines established in the Peruvian Technical Standard ISO 37001 – Anti-Bribery Management Systems.

This **Anti-Corruption Policy** establishes the general guidelines, the framework of reference and the procedures to be followed by the Collaborators of the Buenaventura Group to identify, prevent and mitigate acts of corruption or any kind of violation of the Compliance Laws in all activities, businesses, operations, projects and relationships involving the Buenaventura Group, and includes the guidelines, directives, procedures and internal controls developed in this instrument and its Annexes.

Our **Anti-Corruption Policy** identifies various types of risks due to the non-application of the Compliance Laws to which the Buenaventura Group could be exposed in the exercise of its activities and given the nature of its operations, against which the Company maintains a clear strategy of "zero tolerance", "effective prevention" and "regulatory compliance".

Based on the foregoing, it is very important for the Buenaventura Group that all its Collaborators, members of the Board, Vice Presidents, Managers, Executives, Employees, Affiliates, Agents, Representatives, Consultants, Contractors and any third party acting on behalf of, in the interest of the Company, or adhered to by contract, comply with the Compliance Laws, even when local customs could allow a certain activity prohibited by the Compliance Laws or this Anti-Corruption Policy.

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2. Definitions

Below are the main defined terms used in this document, whether capitalized or not:

- **Something of Value:** Includes any type of benefit and includes, but is not limited to the following:
 - Money (including discounts, debit or prepaid card, credits).
 - Services: health care, home improvement, education.
 - Gifts: jewellery, computers, clothing, art, cars, spa treatments, etc.
 - Donations: political contributions, mortgage payments, car rentals
 - Charitable contributions to an organization in which a Public Official is involved
 - Travel: airline tickets, hotel payments, food and/or per diem for the Public Official, his/her family or friends
 - Investment opportunities: participation in a business, job offer, profit sharing or commissions
- **Final beneficiary:** Person or entity that uses the goods, services or knowledge delivered.
- **Generic Active Bribery:** Offer, give or promise, in any form, to an official or public servant a donation, promise, advantage or benefit to perform or omit acts in violation of their obligations.
- **Transnational Active Bribery:** Offering, granting or promising, in any form, directly or indirectly, to an official or public servant of another State or official of a public international body, a gift, promise, advantage or undue benefit that results in his own benefit or that of another person, so that said public official performs or omits acts proper to the position or employment, in violation of his obligations in order to obtain or retain a business or other undue advantage in the performance of international economic or commercial activities.
- **Collaborators of the Buenaventura Group:** These are persons such as directors, managers, attorneys-in-fact, representatives, workers and all personnel who maintain a work, contractual or statutory relationship, whether permanent or temporary, with the Company.
Collusion: Arrange with an official or public servant who, intervening directly or indirectly, by reason of his position, at any stage of the modalities of acquisition or public procurement of goods, works or services, concessions or any operation by the State, in order to defraud the State or an entity or agency of the State.
- **Corruption in the private sphere:** Accept, receive or request, directly or indirectly, a donation, promise or any other undue advantage or benefit of any nature, for itself or for a third party in order to perform or omit an act that allows to favor another in the acquisition or marketing of goods or merchandise, in the contracting of commercial services or in commercial relationships. Likewise, to promise, offer or grant, directly or indirectly, to shareholders, managers, directors, administrators, legal representatives, attorneys-in-fact, employees or advisors of a legal person of private law, non-governmental organization, association, foundation, committee, including

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non-registered entities or irregular companies, an undue advantage or benefit of any nature, for them or for a third party, as consideration for carrying out or omitting an act that allows this or another in the acquisition or marketing of goods or merchandise, in the contracting of commercial services or in commercial relations.

- **Corruption within private entities:** Accept, receive or request a donation, promise or any other undue advantage or benefit of any nature for itself or for a third party to perform or omit an act to the detriment of the legal person. Likewise, to promise, offer or grant, directly or indirectly, to shareholders, managers, directors, administrators, legal representatives, attorneys-in-fact, employees or advisors of the Company an undue advantage or benefit of any nature, for them or for a third party, as consideration for performing or omitting an act to the detriment of the legal person.
- **Due diligence:** Anti-corruption and corporate compliance due diligence is the process through which relevant information is identified, verified and evaluated, risks of violation of Compliance Laws, red flags, adverse findings, sanctions lists and other sources of information regarding suppliers, customers, collaborators and third parties in general with whom the Buenaventura Group relates and interacts. The process of anti-corruption due diligence and corporate compliance is carried out taking into account the nature and exposure to risks of each person or entity, in order to allow the Company to make duly informed and motivated decisions regarding them, as well as identify, prevent, and mitigate risks of committing crimes.
 - **DOJ:** United States Department of Justice.
 - **Donation and/or Charitable Contribution:** Free and voluntary transfer of goods, services, knowledge or Something of Value by the Company to the Donee or in favor of another person or institution that accepts it, or of the Final Beneficiary.
 - **Donor:** Person or entity that makes the donation, charitable contribution or delivery of something of value (The Company or Buenaventura Group).
 - **Grantee:** Person or entity in favor of whom the donation, charitable contribution or delivery of something of value is made, and who is not necessarily the Final Beneficiary.
 - **Illegal financing of political parties:** Request, accept, deliver or receive, directly or indirectly, contributions, donations, gifts or any other type of benefit from a legally prohibited source of financing, knowing or should know its origin, for the benefit of a political organization or electoral alliance, registered or in the process of registration.
 - **Financing of terrorism:** Obtain, collect, gather or facilitate any type of goods or means or perform acts of collaboration in any way favoring the commission of terrorist crimes; provide documents and information about people and assets, facilities, public and private buildings and any other that specifically contributes to or facilitates the activities of terrorist elements or groups; assign or use any type of accommodation or other means likely to be used to hide people or serve as a deposit for weapons, explosives, propaganda, food, medicines, and other property related to terrorist groups or their victims; transfer persons belonging to terrorist groups or linked to their criminal activities, provide any type of assistance that favors the

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escape of terrorist groups; organize courses or conduct of indoctrination and instruction centers of terrorist groups, operating under any cover; manufacture, acquire, maintain, remove, store or supply weapons, ammunition, substances or explosive, asphyxiating, flammable, toxic or any other object that could cause death or injury; including any form of action assistance or mediation carried out for the purpose of financing the activities of terrorist elements or groups.

- **Foreign Corrupt Practices Act (FCPA):** The Foreign Corrupt Practices Act of the United States, in effect since 1977, which prohibits the payment of bribes to Public Officials outside of that country and to which the Company is subject for listing on the New York Stock Exchange ("NYSE"). The FCPA also requires the keeping of books and accounting records that accurately, transparently and truthfully reflect the Company's transactions, as well as a system of effective internal controls.
- **Private Official:** Is the partner, shareholder, manager, director, administrator, legal representative, attorney, employee or advisor of a legal person of private law, non-governmental organization, association, foundation, committee, including unregistered entities or irregular companies.
- **Public official:** Any person performing public functions or holding a legislative, administrative or judicial office, by appointment, election or as successor, or any person exercising a public function, including for a public body or a public enterprise, or any official or agent of a local or international public organization, or any candidate for a public office. The following shall be considered to be public officials and servants:
 1. Those who are included in the administrative career.
 2. Those who hold political positions or positions of trust, including those arising from popular election
 3. Anyone who, regardless of the labour regime in which he/she is employed, maintains an employment or contractual relationship of any kind with entities or bodies of the State, including State enterprises or mixed-economy companies included in the business activity of the State, and who by virtue of this exercises functions in such entities or bodies.
 4. Administrators and depositaries of assets seized or deposited by a competent authority, even if they belong to private individuals.
 5. Members of the Armed Forces and National Police.
 6. Those appointed, elected or proclaimed, by the competent authority, to perform activities or functions on behalf of or in the service of the State or its entities.
 7. The others indicated by the Political Constitution and the law.
- In addition, (1) any officer or employee of a government entity, government department, or government agency; (2) any officer or employee of a corporation wholly or partially owned or controlled by the government; (3) any officer or employee of a public international organization such as the United Nations, the International Monetary Fund, the World Health Organization, the World Bank, the Inter-American Development Bank, or the like; (4) any

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officer of a political party or any political party; (5) any candidate for political office; (6) individuals acting on behalf of any of the individuals or organizations listed above, or (7) anyone who is considered a government representative or assumes the functions of a government (a subject or entity controlled by a government and performing a governmental function, including without limitation leaders, representatives of rural communities, as well as legal representatives of communal enterprises, is also considered a Public Official.

- **Money laundering:** Converting, transferring money, goods, effects or profits whose illicit origin is known or should be presumed, in order to avoid the identification of their origin, their seizure or confiscation; acquiring, using, possessing, keeping, managing, guarding, receiving, hiding or maintaining money, goods, effects or profits, whose illicit origin is known or should be presumed; transport or transfer by any means within the national territory cash or negotiable financial instruments issued "to the bearer" whose illicit origin is known or should be presumed, in order to avoid the identification of their origin, their seizure or confiscation; or bring in or leave the country by any means such goods, whose illicit origin is known or should be presumed.
- **Compliance Laws:** Comprises the relevant rules of the Peruvian Criminal Code and Special Criminal Laws, the legal basis applicable to money laundering, terrorist financing and other crimes related to illegal mining and organized crime (Legislative Decree No. 1106; Law No. 27693 and its amendments and supplements; SBS Resolutions No. 6115-2011 and No.8930-2012); the Law that regulates the administrative liability of legal entities for the crime of bribery (Law No.30424 and its amendments), as well as the provisions of the Foreign Corrupt Practices Act of the United States known by its acronym "FCPA" (15 U.S.C. §§ 78dd-2, et seq.) and other applicable U.S. regulations, as well as their respective amendments.
- **Sanctions lists:** Those lists of sanctioned persons or entities whose verification is carried out in accordance with Annex 2-A "Information Verification Mechanisms" of this Policy.
- **Gratuities:** Gifts and/or Tokens of Appreciation:
 - **Gift:** Something given free of charge on a voluntary or customary basis. It is given in the form of good or service as a symbol of friendship or appreciation, or to promote good personal, professional and commercial relationships. Gifts include, but are not limited to, promotional items, food baskets, consumer vouchers, tickets for sporting and cultural events, travel, and any other items of value that are awarded to an individual or group of people in which the host is not present.
 - **Token of Appreciation:** Courtesy granted personally to third parties for the purpose of initiating or fostering a business or professional relationship. This includes, but is not limited to, events, meals, business meetings, workouts, conferences, trips, or others in which the host is present.
- **Extortion Payments:** It is the demand for payment of an amount determined by force to personnel through real or presumed threats against health, safety or freedom.
- **Facilitation Payments:** These are unofficial payments made to a public official or government entity in order to obtain or expedite the performance of a routine or necessary action to which

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the applicant is entitled. Facilitation payments are prohibited by the Buenaventura Group.

- **Politically Exposed Person (PEP):** natural persons, national or foreign, who hold or who in the last five (5) years have held prominent public functions or prominent functions in an international organization, whether in the national or foreign territory, and whose financial circumstances may be the object of public interest. Similarly, a direct collaborator with the highest authority of the institution is considered to be a PEP. This includes relatives up to the second degree of consanguinity and second degree of affinity and the spouse.
- **Registration of persons disqualified from contracting with the State:** Registration of suppliers, participants, bidders or contractors sanctioned with temporary or definitive disqualification from contracting with the State published by the State Procurement Supervisory Agency (OSCE).
- **SEC:** Securities and Exchange Commission of the United States.
- **Bribery:** Act of offering, promising, giving, soliciting or receiving undue advantages (in the form of a monetary payment, product, service, loan, Gift, Something of Value or others), directly or through third parties, as remuneration or reward in order to obtain or retain business compromising the judgment or integrity of the recipient, or inducing this person to perform a corrupt or incorrect act in the exercise of their duties.
- **Business Partners:** Those natural or legal persons linked to Grupo Buenaventura for a reciprocal economic or commercial interest, including, but not limited to customers, *joint venture* partners, consortia or any other form of business association, suppliers, contractors, subcontractors, agents, distributors, intermediaries and investors.
- **Regulated Entity:** Persons and entities falling within the scope of SBS Resolution No. 789-2018, which specifically includes mining companies that are engaged in the sale, final export and import of raw or semi-finished gold, as well as the direct product of a mining and/or metallurgical process, as is the case of the Company, which are obliged to implement a system of prevention of money laundering and financing of terrorism in accordance with the scope of said resolution and applicable related regulations.
- **Influence Peddling:** Whoever, invoking or having real or simulated influence, receives, causes to give or promise for him-/herself or for a third party, a gift or promise or any other advantage or benefit with the offer to intercede before an official or public servant who is to hear, is hearing or has heard a judicial or administrative case.

3. Corporate Crime Prevention Policies

- The Buenaventura Group strictly prohibits any act of corruption, bribery, money laundering, terrorist financing and all kinds of crimes in general.
- The Company is committed to strictly comply with the applicable anti-corruption regulations in accordance with the provisions of the FCPA, the U.S. Judgment Guidelines and SEC and DOJ guidelines and precedents, using an approach based on risk identification and establishing an

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- adequate control environment for sensitive operations.
- The Buenaventura Group has implemented a **"Corporate Compliance Program"**, in accordance with the requirements of the FCPA, having adopted the following general obligations:
 - Any Buenaventura Group Employee or third party acting on behalf of, in the name of, in the interest of the Company or contractually adhering to this Policy must not offer, promise or give Anything of Value to a Public Official for the purpose of obtaining, retaining or securing any business, advantage or improper benefit for the Company.
 - Under no circumstances should a false or misleading entry be made in the Company's operating records or accounting with the aim of concealing improper payments (e.g. hiding a bribe by including it as part of the fees paid to a service provider). This implies that the accounting records and accounts have a reasonable level of detail to accurately and precisely reflect the transactions and utilization of the Company's assets.
 - The Company must establish and maintain a system of internal controls that provide reasonable assurance that the assets are being used for authorized purposes of the Company's business, and that transactions are being recorded in a transparent and appropriate manner, thereby encouraging the preparation of correct financial statements.
 - The **"Corporate Compliance Program"** must contemplate the following action fronts:
 - Commitment of the Board of Directors, General Management, Vice Presidencies and Management to the implementation of the Corporate Compliance Program, giving a clear message of zero tolerance to acts of corruption and violation of the Compliance Laws.
 - Establishment and continuity of a Compliance Management, with sufficient resources and independence to ensure the implementation and continuous improvement of the Corporate Compliance Program.
 - Comprehensive *risk assessment* of each of the companies of the Buenaventura Group, identifying specific risks of corruption and violation of the Compliance Laws;
 - Reliable complaint mechanism accessible to all Company Collaborators; as well as a protocol and process for investigating complaints, protecting the identity of complainants and ensuring impartial and adequate solutions as a result of independent internal investigations;
 - Evaluation and implementation of procedures reasonably designed for the prevention, detection and timely reporting of unusual and suspicious money laundering and/or terrorist financing operations, which are included in the Company's Money Laundering and Terrorist Financing Risk Prevention and Management Manual.
 - Design of incentives and identification of disciplinary measures of lesser to greater severity with respect to the objectives of the Corporate Compliance Program.
 - Development and implementation of a due diligence protocol of customers, suppliers, collaborators and third parties (e.g. intermediaries, agents, people with high interaction with

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public officials, entities receiving donations, future partners), monitoring and continuous improvement of the due diligence process.

- Monitoring, review and continuous improvement of the Code of Ethics and Good Conduct, policies, processes and internal controls necessary to achieve the objectives of the Corporate Compliance Program, including the optimization of those established in this Anti-Corruption Policy and its Annexes.
- Development of training and coaching tailored to each area and hierarchy of Collaborators, Directors, Vice Presidents, Managers, Executives, Employees and where appropriate with respect to Affiliates, Agents, Representatives, Consultants and Contractors, regarding the culture of the Company in the face of risks of corruption and violation of the Compliance Laws.

The Managers have the responsibility to ensure compliance and appropriate documentation of the execution of this Policy, complying with the framework of action detailed here, both individually and collectively (of the team under their charge). This is in order for each Management to have adequate traceability before internal or external audits, and possible investigations.

3.1. FCPA: Bribery in the public and international sector

The payment or promise to make a Bribe to a Public Official or to a company of which a Public Official is a shareholder, director, executive, affiliate, agent, representative, employee, consultant, contractor, as well as the payment to a relative or to any person who delivers, shares or promises to deliver the Bribe to a Public Official, whatever the amount or value of such Bribe, or whatever the type of offer or delivery of Something of Value to a Public Official in order for the Company to receive an undue advantage in exchange for such Bribe, can cause great losses to the Company and severe damage to its reputation and good institutional image.

Most Important Aspects of the FCPA

The FCPA is divided into anti-bribery provisions and accounting provisions. Accounting provisions include rules that require the Company to maintain adequate, correct and transparent books, records and internal controls. Anti-bribery provisions prohibit the direct or indirect payment, or gift in cash or of Something of Value, (or even the offering, promise or authorization of a payment, gift or Something of Value) with corrupt intentions to a Public Official.

The prohibition of a payment or offer of Something of Value to a Public Official applies to direct and indirect payments. This means that the company will be held liable if one of the Collaborators of the Buenaventura Group makes a payment or offer of Something of Value to a Public Official directly or indirectly through external agents (consultants, lawyers, agents, managers or subcontractors).

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Examples of situations where there are payments or offers of Something of Value with corrupt intentions to Public Officials include:

- To influence the award of a contract with the state, an authorization, license or permit.
- To avoid a government action, such as the imposition of a tax or fine or the cancellation of a contract with a state entity.
- To obtain confidential information about business opportunities, tenders, competitors.
- To authorize or not sanction activities of unfair competition.
- To influence the bidding specifications for government projects or the awarding of bids in favor of certain bidders.
- To obtain environmental rights or permits (Environmental Impact Assessment - EIAs, Certificate of No Archaeological Remains - CIRA, Water Use Licenses, Carbon Credit Certificates and others related to deforestation, waste disposal, etc.) or of any other type (mining concessions, easements, etc.).
- To influence the tax rate that will be applied to the operations of a company.
- To ease government controls.
- To resolve conflicts with government entities.
- To affect the nature of foreign regulations or the application of regulatory provisions (customs, administrative fees, visas, etc.).
- To expedite procedures for the benefit of the Company.

3.2. Penalties for violations of the FCPA

The criminal penalties provided for under the FCPA are severe. The U.S. Securities and Exchange Commission (“SEC”) and the U.S. Department of Justice (“DOJ”) share responsibility for the oversight of FCPA. The DOJ is responsible for FCPA criminal penalties and civil oversight against publicly registered companies. The SEC has civil jurisdiction over publicly registered companies. Fines for each violation of FCPA anti-bribery provisions include:

a) Criminal penalties

For acts of bribery:

- Fines of up to US\$250,000 for each breach for individuals, and up to US\$2,000,000 for each breach for businesses;
- Imprisonment for up to five years for individuals;
- Fines of up to double the profit or loss resulting from undue payment, whichever is greater, for both companies and individuals.

For violations of accounting requirements:

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- Companies face fines of up to \$25,000,000 for violation or up to double the profit earned or loss generated by the offense.
- With respect to criminal penalties, natural persons convicted of violation of accounting provisions face up to US\$5,000,000 per violation or up to twice the profit earned or loss generated by offenses and up to 20 years in prison.

b) Civil penalties:

For acts of bribery:

- Civil penalties for Individuals or Legal Entities up to US\$21,410 for each FCPA violation.

For violations of accounting requirements

- Any natural person who intentionally violates the accounting or records and books provisions of the FCPA, faces civil fines of up to US\$192,768.
- Companies that intentionally violate these provisions will face civil fines of up to US\$963,837,725,000.
- Both natural persons and companies may also be obliged to return profits acquired through their respective illegal activities.
- Alternatively, a natural person or an enterprise may be sentenced to pay a criminal penalty of up to twice the amount of any monetary gain resulting from the infringement, whichever is greater.

There are numerous monetary consequences resulting from violations of the FCPA, including, in addition to these, the disqualification of the company from contracting with the US government, the possible removal of its securities from the US Stock Exchanges, the inclusion of the company and its officials in sanctions lists, causing serious damage to the good reputation and institutional image of the Company internationally.

4. Objective, scope

4.1 Objectives

This Policy aims to establish the general guidelines, the frame of reference and the procedures to be followed by the Collaborators of the Buenaventura Group to identify, prevent and mitigate acts of corruption or any kind of violation of the Compliance Laws in all activities, businesses, operations, projects and relationships involving the Buenaventura Group. This Policy provides information that allows recognizing situations of risk of violation of the Compliance Laws and also establishes procedures to ensure that all Company Collaborators have a clear understanding of the conduct expected of them in strict compliance with the Compliance Laws that are applicable

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to the Buenaventura Group.

4.1.1 Specific objectives:

- Communicate senior management's commitment to strict compliance with the Compliance Laws.
- Identify Collaborators, Directors, Executives and Employees whose roles include specific responsibilities to promote adequate compliance with the Anti-Corruption Policy, which includes the Company's Crime Prevention Model.
- Raise awareness among all Company employees of the risks associated with anti-corruption, anti-bribery management.
- Promote the integration of anti-corruption management, anti-bribery and prevention of money laundering, terrorist financing in the Company's business processes.
- Establish the specific parameters that govern the controls of compliance with the Compliance Laws.

4.2 Scope

This Anti-Corruption Policy is mandatory for the Board of Directors and for all Employees of the Buenaventura Group, which includes without limitation the following persons:

- Members of the Board of Directors,
- Vice Presidents,
- Managers,
- Holders of power of attorney,
- Legal Representatives and
- Collaborators in general.

Likewise, this Policy is mandatory for business partners acting on behalf of, in the interest of, in the name of or adhering to a contract with the Buenaventura Group, which includes without limitation the following persons:

- Suppliers,
- Customers,
- Contractors and subcontractors,
- Partners, Shareholders, counterparties, business partners and joint ventures.

The Vice Presidencies, Managers and members of the Board of Directors of the Company shall be responsible for making the personnel under their charge aware of this Policy and its Annexes.

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5. Anti-Corruption Guidelines

5.1 Bribery in the private sphere

Although the FCPA law is limited to acts of corruption and bribery of Public Officials and to accounting requirements to have transparent, truthful and detailed books and accounting records that reflect the operations and transactions of the Company, Grupo Buenaventura seeks to avoid any type of act of bribery, including those in the private sphere, in compliance with the Peruvian Criminal Code.

The Collaborators of the Buenaventura Group and third parties acting on behalf of , in the name of, in the interest of, or contractually adhered to this Policy, of the Buenaventura Group are prohibited from receiving gifts, token of appreciation or special or personal contributions, either directly or indirectly, for the performance of their functions, activities or obligations in their charge.

Likewise, the Collaborators of the Buenaventura Group and third parties, mentioned above, must conduct themselves at all times in an ethical, comprehensive manner, giving priority to the business interests of the Buenaventura Group and avoiding incurring a conflict of interest or the appearance of a conflict of interest. A conflict of interest is a situation in which the personal interests of a Contributor or third party interfere in any way with the interests of the Company.

Some examples of situations in which a Contributor or a third party takes advantage or gives the appearance of taking improper advantage of the position they hold or of the function, activity or obligation in their charge, in order to obtain some personal advantage, are the following:

- Request or receive a "commission" in exchange for favoring a supplier in a tender or direct purchase,
- Request or receive a "commission" in exchange for selling products or assets to a certain customer without prior bidding, or
- Offer or deliver a "commission" in exchange for soliciting business favors from a supplier in a tender or direct purchase.

Such acts are contrary to the ethical culture of the Company and, if they occur, may be grounds for dismissal and legal action at the decision of the Company regardless of the amount and charge of the person involved.

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For more details on the relationship with business partners, see the guidelines of the Company's Crime Prevention Model contained in Annex 6.

5.2 Relationship with Public Officials

Due to the nature of the economic activity of the Buenaventura Group, the relationship with public officials is a recurring activity in the development of its operations and, therefore, necessary to ensure the continuity of the business.

The Company encourages the Employees of the Buenaventura Group to maintain good relations with said Officials, to the extent that this does not constitute a violation of the Compliance Laws, this Anti-Corruption Policy, the Code of Ethics and Good Conduct, or the other rules applicable to the Company.

5.2.1 Appropriate relationship

The Collaborators of the Buenaventura Group may relate to public officials as long as there are business matters involved, specific to the area to which they belong and relevant to the functions corresponding to their position and functions.

5.2.1A. FCPA Expenses

As part of an appropriate relationship with public officials, government entities or relevant rural communities in the area of influence of the operations of the Buenaventura Group, reasonable and legitimate requests or initiatives for expenses or deliveries of something of value could be presented. Any request or initiative for reasonable and legitimate expenditure, made in a transparent manner, in good faith and without intent to corrupt, involving a public official, public institution or rural community within the framework of a legitimate commitment, project, or activity must be evaluated by the competent persons within the Company who approve the Expense Authorization Form Subject to the FCPA, in accordance with Annex 1 and Annex 1-A that are an integral part of this Policy.

If an expense or delivery of something of reasonable and legitimate value is approved, under no circumstances may it consist of the delivery of cash, checks, promissory notes, bearer securities or similar to any public official, government entities or rural community, the Company being only authorized to deliver goods and/or services (for example: transport costs, accommodation, food, among others) directly to the beneficiary thereof through its duly authorized suppliers. In this regard, the Logistics area will verify that the goods or services delivered are at market value and

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have the corresponding documentation, justification and invoices or payment instrument in accordance with the Law. The Company will maintain an up-to-date record of all reasonable and legitimate approved expenses.

5.2.1.B Communications

With regard to initiating, responding to, attending to or in any way participating in a dialogue, communication, meeting or appropriate interaction with a public official, you must consider the concurrence of a "legitimate business reason", a "suitable interlocutor" and an "appropriate form" as follows:

i. By **legitimate business reason** it should be understood that the matter to be discussed includes a relevant business interest of the Buenaventura Group and within the scope of the functions performed by the Collaborator who will act on behalf of the Company. Such interest must be lawful, motivated and not in contravention of the Compliance Laws and this Anti-Corruption Policy.

ii. A **suitable interlocutor** is a competent public official duly authorized to represent the Public Entity or authority with which a dialogue is desired. On the part of the Company, only those Collaborators who have powers of representation or a designation corresponding to statutory powers duly registered with Public Registries to act on behalf of the Company may enter into a legitimate dialogue with public officials; those Collaborators who have express authorization from the aforementioned persons to enter into such dialogue; the Collaborators who by the nature of the position and functions they perform in the Company routinely interact with public officials; or the external advisors or consultants authorized in writing by the Company to act on its behalf. The intervention of intermediaries or any third party that is not authorized to act on behalf of the Company as described in this paragraph is not valid.

iii. **Appropriate form** must be understood as the use of formal means, preferably in writing, addressed to official addresses or emails, and the content of the communication must always be expressed in a clear, precise and transparent manner, which must include the legitimate business reason to be treated, the actions proposed or required for it, the identification of the interlocutor including his/her name and position, the date of the communication, and any other aspect relevant to the purposes of the Company.

For more details on the commercial relationship with public officials, see the guidelines of the Company's Crime Prevention Model contained in Annex 5.

5.2.2 Inappropriate relationship

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The Buenaventura Group strictly prohibits its Collaborators from carrying out the following activities when they relate to public officials:

- Offering, paying or giving anything of value to a public official, local or foreign, in order to obtain or maintain an undue business or benefit to the Company.
- Attempting to induce a public or private official, local or foreign, to breach their duties, make decisions against current procedures or rules, or perform any other illegal or unethical act.
- Paying any person when it is known or there is reason to suspect that all or part of the payment may be channeled to a public official.
- Inducing, helping or allowing someone else to violate these rules.

An improper benefit, economic or otherwise, can have many forms including, but not limited to, the delivery of something of value, gifts, entertainment, reimbursement of expenses, contributions, loans, rewards, investment opportunities, subcontracts, business commissions or business incentives, regardless of:

- The Results.
- The value.
- Local customs (or perception of local customs), or
- Tolerance of the authorities in the jurisdiction of the public official.

Facilitation Payments are unofficial payments made to a public official or government entity in order to obtain or expedite the performance of a routine or necessary action to which the applicant is entitled. In the Buenaventura Group it is forbidden to make facilitation payments, regardless of the amount involved.

5.3 Purchase of goods and services

The Collaborators of the Buenaventura Group must be careful and consider the risks of improper relationship¹ in the purchase of goods and services, always channelling their needs for the purchase of goods through the Logistics area.

The Buenaventura Group is responsible for the actions of any third party acting on behalf of, in the name of or in the interest of the Company, or who contractually adheres to this Policy, therefore Buenaventura Group Employees must validate that such third parties do not make, offer or promise undue payments to public officials or in the private sector.

¹ For example, transactions such as the purchase of land or local purchases could unintentionally expose the Company in the event that the counterparty to such transactions are Government Officials with whom there are pending proceedings or negotiations.

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In order to achieve a comprehensive knowledge of the suppliers of goods and services of the Buenaventura Group, the Logistics area will collect the information from them through a pre-established format², and will also verify the identity and information provided by said suppliers, using the Information Verification Mechanisms that are developed in Annex 2-A of this Policy. Such process of verification and registration of suppliers prior to the start or renewal of the business relationship, will allow the Company to identify "sensitive" suppliers and those suppliers for which it will not be appropriate to start or renew a business relationship or it will be necessary to implement controls and protections to measure, based on adverse findings or high risks of violation of the Compliance Laws as a result of due diligence. In such cases, the Corporate Compliance Officer will supervise that "sensitive" suppliers or those with adverse findings are subjected to a thorough evaluation and on a case-by-case basis prior to the start or renewal of the business relationship.

The actions to be carried out by the Logistics area include, but are not limited to:

- Verifying that the supplier has the capacity to carry out the required services (experience, seniority in the business, etc.).
- Identifying any relationship between the supplier (any of its legal representatives, shareholders, directors or managers) and Politically Exposed Persons (PEPs).
- Reviewing past experiences the supplier has with the companies of the Buenaventura Group.
- Confirming that the payments for the goods or services to be provided correspond to market values.
- Carrying out due diligence using the Information Verification Mechanisms that are set out in Annex 2-A of this Policy. Immediately reporting to the Corporate Compliance Officer any kind of adverse finding and/or the "sensitive" character of a supplier based on the searches carried out under the Information Verification Mechanisms.
- Maintaining an up-to-date record of all suppliers after completing their due diligence. The supplier registry shall be updated at least every two (2) years.

In this sense, the Logistics area of the Buenaventura Group must be diligent in the evaluation of the purchase of goods and services under its responsibility in order to avoid that the transactions may be or appear to be a facade for violation of the Compliance Laws.

Likewise, the Collaborators of the Logistics area and those who manage contracts in the Buenaventura Group, must remain vigilant for the timely identification of unusual payments and warning signs related to the behavior of the supplier, and inform the Corporate Compliance

²The documents for the knowledge of the suppliers will be published on the Company's website.

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Officer of any suspicious behavior or risk of non-compliance with the Compliance Laws. To do this, they must:

- Verify all compensation, fees, prices and/or any kind of expenses invoiced by all suppliers to confirm that these are reasonable, justified on the basis of legitimate goods or services and at market value.
- Verify that the invoices and payment vouchers issued are in accordance with current tax regulations and that they accurately, in detail and truthfully reflect the goods and/or services provided, including a description thereof and avoiding the use or subsequent registration of ambiguous, imprecise or vague accounting glosses, categories or sub-categories.
- Identify possible irregularities in relation to the goods and/or services contracted, such as:
 - Unexpected streamlining of processes or procedures when longer deadlines were estimated,
 - Unexpected results of a process or procedure when there were doubts about the success of the management, among others.
- Reject and immediately report to the Corporate Compliance Officer any payment or request for payment that is known or may be presumed or suspected to be intended in whole or in part to be channeled, directly or indirectly, to a public official.

For more information regarding the functions of the Logistics area personnel in charge of carrying out due diligence, see the Goods and Services Purchase Guide which as Annex 2 is an integral part of this Policy.

5.4 Gifts.

Employees of the Buenaventura Group are prohibited from soliciting, promising, delivering, authorizing or accepting gifts, gratuities or hospitality to or from public officials or other third parties, regardless of the amount or economic value it may represent.

Exceptionally, the Managers, Vice Presidents, Directors, or the General Manager may authorize such acts in accordance with the Gift Policy approved by the Company.

5.5 Donations and/or Charitable Contributions.

Donations, charitable contributions and any kinds of delivery of something of reasonable and legitimate value with a charitable purpose by the Buenaventura Group made with the ultimate aim of promoting self-sustainable development and improving the quality of life of the people and rural communities that inhabit our area of local, regional and national influence are regulated in the Policy of Donations and/or Charitable Contributions approved by the Company.

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5.6 Political contributions

The Buenaventura Group does not make political contributions or gifts of any kind or financial value to political parties, candidates, campaigns or referendums (whether at the local, regional, national or international level).

In this regard, the Collaborators of the Bonaventure Group should not:

- Use Company funds, assets, resources, time or personnel, including in-kind contributions of supplies, equipment or services, to make any political contribution, or assist any political party, individual political party or political candidate.
- Use Company funds to make payments, loans, donations or gifts to political parties, individual politicians or political candidates.
- Use Company funds to pay admission fees to conferences, meals, or similar events organized by political parties, individual politicians, political candidates, or their supporters, or to purchase their publications, where an element of fundraising has been implicated.
- Provide politicians or political candidates or their staff with travel or accommodation.
- During their time at Grupo Buenaventura through the use of funds, assets, resources or personnel of the Company, suggest to other Contributors of Grupo Buenaventura or Third Parties, directly or indirectly, that they give their support or contributions to political parties, individual politicians or political candidates.
- Use Company funds to make payments to organizations that are fronts of political parties, individual politicians, or political candidates, or that provide means to channel funds to them.
- Directly or indirectly hire a candidate or official of a political party for any type of work.

The Buenaventura Group is aware that the prohibited financing of political organizations is a crime regulated in the Criminal Code, so it is prohibited in the Buenaventura Group to request, accept, deliver or receive, directly or indirectly, contributions, donations, grants or any other type of benefit from a legally prohibited source of financing, knowing or should to know its origin, for the benefit of a political organization or electoral alliance, registered or in the process of registration.

All requests for political contributions must be addressed to the General Manager, who in the exceptional event of approving any request will record such fact in writing.

5.6.1 Exception: Personal political contributions

The collaborators of Grupo Buenaventura may make political contributions in their personal capacity and participate in any political activity in their free time. However, given that they are

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also collaborators of Grupo Buenaventura and that their activities could be confused with the activities of the Company, they must:

- Sign that it is their own contributions and not Grupo Buenaventura.
- Refrain from using the Buenaventura Group's time, computer resources or means to conduct or carry out their personal political activities.
- Refrain from obtaining in any way a refund for their contributions from Grupo Buenaventura.

5.7 Books, Records and Internal Controls

The Buenaventura Group is committed to continuously developing, documenting, maintaining and improving its internal controls with respect to the objective of financial reporting, to ensure that all payments are accurately recorded in the books and accounting records of the Company, and must:

- Always record payments correctly and transparently.
- Maintain books, accounts, records, nomenclatures and classifications of expenses that accurately reflect all financial operations, including all cash disposals in the Company.
- Maintain an internal control accounting system that can detect and prevent payments not permitted by this Policy.
- Adjust operations to generally accepted accounting principles or international financial reporting standards, as applicable.
- Perform periodic comparisons of recorded assets versus existing assets in order to identify and address disparities.
- Carry out accounting audits on a regular basis.
- Write off losses and penalties locally to the cost center in which the event occurred.

In this sense, all payment vouchers submitted to the Accounting area must have a complete and accurate description of the character, nature and purpose of the payment or expense, and must be supported by receipts, orders or other applicable documents, in order to prevent:

- Bribery and corrupt practices.
- Unregistered ("off-book"), incorrectly identified or secret accounts.
- Records that do not appropriately and fairly reflect the transactions to which they relate or that omit transactions to be recorded.

5.8 Mergers, Acquisitions and Joint Ventures

In the event that Grupo Buenaventura is considering carrying out a process of merger, acquisition

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or association of companies, the Compliance Management, in coordination with the Vice President of Finance and Administration and specialized third party advice, is responsible for carrying out an anti-corruption due diligence and corporate compliance procedure of the target company, in order to verify its corporate compliance culture, identify its main corruption risks, as well as its internal controls and processes to prevent them, and in order to determine the necessary improvements, possible violations, risk mitigation and the mechanisms that are required to adapt the target company to the Anti-Corruption Policy and the Corporate Compliance Program of Grupo Buenaventura. Likewise, the Compliance Management, in coordination with the Legal Management, must coordinate the performance of anti-corruption and corporate compliance audits of its partners in joint-ventures, consortia or other types of associations, with the purpose of ensuring compliance with the Compliance Laws and this Policy.

The scope of due diligence includes, but is not limited to:

- Carry out a risk analysis of the target company (*Risk Assessment*), taking into account the activities of the business, its functional organization, policies and internal rules, in order to classify medium, high and very high risks, as well as short and medium term risks and identify the measures required to prevent and mitigate them.
- Review all material interactions between the target company and any government, public body, public company, international public organization and any Public Official.
- Carry out an anti-corruption verification of the target company, its main executives, legal representatives and partners, using the information verification mechanisms referred to in Annex 2-A.
- Form a working partnership between the Buenaventura Group trading team and the risk team of the target company.
- Review the relevant reports of the target company including, but not limited to, financial and accounting records, employment records, supplier records.
- Interview the key personnel of each functional area of the company, as well as the management and compliance officer of the target company.

In addition, it is the Legal Manager's responsibility to take the following additional considerations into account when carrying out a merger or acquisition:

- Include clauses in contractual agreements that require the target company to adopt and comply with the policies of the Buenaventura Group's Corporate Compliance Program.
- Ensure that the target company complies with the clauses of the contractual agreements and the policies of the Buenaventura Group Corporate Compliance Program.
- The Legal Management in coordination with the Compliance Management must monitor the partners in Joint Venture, consortia or other types of associations to warn of new risks of

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corruption that they may face due to changes in their business, deficiencies in their processes and internal controls, breach of the clauses included in the contractual agreements and/or breaches of the Corporate Compliance Program of the Buenaventura Group.

6. Guidelines on the Law Regulating the Administrative Responsibility of Legal Persons for Crimes of Generic Active Bribery, Transnational Active Bribery, Collusion and Trafficking in Influences - Law No.30424, amendments and Regulations

The Company is committed to complying with national regulations regarding the prevention of risks of corruption, bribery and reputational damage to which it is exposed given the nature and scope of its activities, and as a result of violations of the Compliance Laws that may be incurred by its Collaborators, suppliers, customers and third parties with whom the Company is related. For this reason, the Company promotes strict and integral ethical behavior in compliance with the Compliance Laws at all levels of the organization, as the basis of its Corporate Compliance Program, which in turn includes the guidelines of a Crime Prevention Model as described in the Prevention Manual approved by the Company.

7. Guidelines on the Prevention of Money Laundering

The Company is a regulated entity under the scope of Resolution SBS 789-2018 and is therefore obliged to implement an internal system for the prevention of money laundering and terrorist financing, appoint a Corporate Compliance Officer, perform due diligence on its customers, suppliers and Collaborators, maintain a Register of Transactions and a Register of Suspicious Transactions, and comply with its reporting obligations to the Financial Intelligence Unit of the Superintendency of Banking and Insurance. To this end, the Company has approved the Manual on the Prevention and Management of the Risks of Money Laundering and Terrorist Financing.

7.1 Functions of the Corporate Compliance Officer:

The Company has a Corporate Compliance Officer, who is also in charge of the Prevention Model and of ensuring the application, execution, compliance and continuous improvement of the Buenaventura Group's Corporate Compliance Program. The Corporate Compliance Officer shall be autonomous and independent in the exercise of his/her functions and shall have the necessary resources and budget to perform them.

The main tasks of the Corporate Compliance Officer include the following:

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- Direct the implementation and continuous improvement of the Corporate Compliance Program based on the Compliance Laws.
- Evaluate, prevent and mitigate risks on crimes of corruption, bribery, money laundering or terrorist financing, and in general risks of violation of the Compliance Laws, the Code of Ethics and Good Conduct and this Policy. This includes proposing, delegating and monitoring *risk assessments*.
- Organize and maintain an internal record of periodic trainings to all Company Collaborators on the Compliance Laws, the scope of the Corporate Compliance Program and this Policy, with special emphasis on the Company's anti-corruption, anti-bribery and prevention of money laundering and terrorist financing objectives.
- Propose strategies, mechanisms and procedures for the prevention, identification and remediation of violations of the Compliance Laws, the Corporate Compliance Program and this Policy.
- Lead the implementation, management, monitoring and updating of the efforts and actions required under the internal system for the prevention of money laundering and terrorist financing crimes, fulfilling the duties and powers that correspond to the Corporate Compliance Officer under the scope of the applicable standards.
- Analyze unusual or suspicious transactions that may be detected, in order to report suspicious transactions to the FIU-Peru in a timely manner, in accordance with the internal system for the prevention of money laundering and terrorist financing crimes.
- Identify and propose warning signs of violation of the Compliance Laws, the Code of Ethics and Good Conduct and this Policy.
- Provide advice and support, absolve any doubts that the other areas of the Company may have in relation to compliance with the Corporate Compliance Program and the Compliance Laws.
- Promote the reporting of situations that could generate doubt or suspicion of non-compliance with the Compliance Laws.
- Evaluate and periodically monitor the complaint mechanisms, internal controls and reports that are under their responsibility, in order to oversee their proper functioning.
- Carry out the appropriate coordination in relation to the effective fight against money laundering and other crimes related to illegal mining and organized crime, before the FIU-Peru and other competent authorities.

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- Identify, monitor and inform the Chief Executive Officer and the Board of Directors of the Company on regulatory and normative changes and trends on best market practices that are relevant and serve to strengthen, update, adapt and/or clarify the scope of the Company's Corporate Compliance Program.

8. Awareness raising and training

The Company's Vice Presidents, Managers, Directors, Corporate Compliance Officer assume the leadership and are responsible for the adequate and constant training of the personnel under their charge, promoting awareness and sensitization in compliance with the guidelines established in this policy. Company employees will receive training to recognize and address possible cases of violations of the Compliance Laws, the Code of Ethics and Good Conduct and this Policy.

Without prejudice to the training and information dissemination provided by the Company, Employees are encouraged to raise any concerns or doubts they may have regarding compliance with this Policy.

The Company will be responsible for documenting the training, recording the data of the participants, the dates, the topics covered and the professionals in charge of providing the training.

9. Ethics Line and Whistleblowing Channel

The Buenaventura Group has reliable complaint mechanisms accessible to all Company Collaborators, as well as a protocol and investigation process for complaints, protecting the identity of the complainants and ensuring impartial and adequate solutions.

Employees who observe or suspect that a colleague of the Company, regardless of their rank, has breached the Compliance Laws, this Policy, or the Code of Ethics and Good Conduct must communicate it through the following channels:

- Telephone line: free of charge at local, national and international level.
0800-0026
- Entering the portal www.bdineatica.com/buenaventura

The Company shall guarantee the anonymity or confidentiality of the reporting employee and shall ensure that he/she is not a victim of retaliation.

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10. Disciplinary Measures

Violations of this Policy or failure to cooperate with an internal investigation may result in the application of disciplinary sanctions, depending on the seriousness of the case, which may go as far as the employee's dismissal from his/her duties, in accordance with labor legislation; without prejudice to any civil and criminal actions that may be applicable.

11. Validity and continuous improvement

This Policy is effective as of the date of its publication.

The Company undertakes to promote the appropriate conditions so that all its Employees can become fully aware of this Policy. In addition, it will be responsible for continuously monitoring and improving the guidelines of this Policy.

12. Dissemination

This Policy will be available to all Collaborators at www.buenaventura.com and will also be made available to business partners before the start of the business relationship, for which the business partner must sign an affidavit of receipt and adherence to the guidelines of this policy. If necessary, this policy will also be available and shared in the English language. Priority will be given to establishing commercial ties with companies that have a Corporate Compliance Program and policies similar to those of the Company.

All Company employees must adhere to this Policy through the **Statement of Knowledge and Compliance with the Anti-Corruption Policy** see Annex 3. In the case of business partners, they must adhere to this Policy by means of the **Affidavit of Adherence and Compliance with the Anti-Corruption Policy by a business partner**, see Annex 4.

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ANNEX 1: FCPA Expense Guide

1. Purpose

This FCPA Expense Guide establishes an internal control and procedure to follow with respect to FCPA expenses that include those requests or initiatives for the realization of reasonable and legitimate expenses or deliveries of something of value, which directly or indirectly involves a public official, public institution or rural community in the framework of a legitimate commitment, project or activity, regardless of the amount involved. Requests or initiatives for FCPA expenses must be channeled, evaluated and - if approved - implemented in a transparent manner, in good faith and without intent to corrupt the public official, public institution or rural community concerned, as part of an appropriate relationship with them.

2. Scope

This Guide applies to the Collaborators of the Buenaventura Group both in Lima and in the Mining Units (including temporary or contract personnel) that receive requests or formulate FCPA spending initiatives such as those mentioned above, including those who evaluate, approve or execute them.

3. Procedure

It is established that any FCPA expense request or initiative, that is, involving an expense or the delivery of something of reasonable and legitimate value to a public official, public institution or rural community within the framework of a legitimate commitment, project, or activity, must follow this **FCPA Expense Guide**, which is an integral part of the Anti-Corruption Policy.

Each FCPA expense approval request or initiative must be duly documented and supported following the "*FCPA Authorization of Expense Form*" which is included as **ANNEX1-A**.

If the FCPA expense is approved through the "Expense Authorization Form Subject to the FCPA", under no circumstances may it consist of the delivery of cash, checks, promissory notes, bearer securities or similar to any public official, government entities or rural community, the Company being only authorized to deliver goods and/or services (for example: transport, accommodation, food, among others) directly to the beneficiary thereof through its duly authorized suppliers.

For this purpose, the Logistics area will verify that the goods or services whose delivery has been approved through the "Expense Authorization Form Subject to the FCPA" are goods or services acquired at market value and that they have the corresponding documentation, justification and invoices or


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payment instrument in accordance with the Law. The Company will maintain an up-to-date record of all approved FCPA expenses.

In order for an FCPA expense request or initiative to be approved, it must be submitted to the review, evaluation and approval of the user area, as well as the Compliance area. In the case of FCPA expenses above S/. 20,000 is additionally required from other approvers (Vice Presidencies, Legal Management). If the sequence of approvals mentioned above is not met, the FCPA expense cannot be made, and it will be understood as a rejected request or initiative.

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APPENDIX 1-A: FCPA Expense Authorization Form

	ANEXO 1A / EXHIBIT 1A	AUTHORIZATION N° 001-2021-FCPA
FORMULARIO DE AUTORIZACIÓN DE GASTOS SUJETOS A LA FCPA FCPA AUTHORIZATION OF EXPENSES <small>Bajo el ámbito de aplicación de la Ley de Prácticas Corruptas en el Extranjero. Under the scope of the Foreign Corrupt Practices Act (FCPA)</small>		
Nombre del funcionario de gobierno, miembro o candidato de partido político, funcionario de una organización / entidad / asociación pública internacional, publico-privada o cualquier persona que formule la presente solicitud en representación de cualquiera de los anteriores ("FP") que formula la solicitud. <i>Name of government official, member or candidate of a political party, official of a public international or public-private organization / entity / association or any person making the present request on behalf of any of the above ("FP").</i>		
Nombre / Name	Institución / Institution	Fecha / Date
Información detallada sobre la solicitud. <i>Specific information about Request.</i>		
Documento / Document	Asunto / Subject	Objetivo / Target
Describa cómo y a favor de quién se realizarán los pagos (Nota: dinero en efectivo nunca será entregado directa o indirectamente a un FP/entidad de gobierno para alimentos, viajes, hospedaje u otros gastos legítimos y razonables. <i>Describe how and to whom payments will be made (Note: cash can never be provided directly or indirectly to FP/government entity for meals, travel, lodging or other legitimate and reasonable expenses).</i>		
¿Este pago es entregado como parte de algún acuerdo específico con el FP que involucre algún negocio, permiso, licencia o apoyo de cualquier tipo, ya sea ahora o en el futuro? Si [] o No [X]. Si la respuesta es sí, por favor explicar. <i>Is this payment being provided as part of any specific agreement with the FP involving a present or future business, permit, license or support of any kind? Yes [] or No [X]. If yes, please explain.</i>		
Gerente que remite esta solicitud. <i>Manager submitting this request.</i>		
BNV	Firma / Signature	Nombre / Name
Fecha / Date		
Gerencia: Relaciones Comunitarias / Community Relations / Otra / Other:		
¿Hay algún contrato u otro documento que respalde esta solicitud? Por favor detallar. <i>Is this request reflected in a contract or another document? Please provide details.</i>		
Respuesta / Answer	Descripción / Description	Fecha / Date
Si / Yes / No:		
Nombre / Name:		
¿Cuál es el objetivo de la actividad a ser financiada? (¿Porqué debería BNV involucrarse en dicha actividad?) <i>What is the purpose of the activity being funded? (Why should BNV engage in such activity?)</i>		
Liste a continuación todas las solicitudes o asuntos que se conozcan vinculados al mismo FP/entidad de gobierno referido(a) líneas arriba dentro de los últimos 12 meses. <i>List all known requests or matters involving the same FP/government entity listed above within the last 12 months.</i>		
Descripción de pago y objetivo/ Description of expense and objective:		
N°	Item	Amount
Total Price		
TOTAL		
Prices include VAT / Precios incluyen IGV		
Aprobación / Approval		
BNV	Firma / Signature	Fecha / Date
Gerencia de Relaciones Comunitarias o Gerencia del Área Usaria / Community Relations Management or Business Unit Manager		
Gerencia de Cumplimiento / Compliance Management		
¿Ha sido esta solicitud revisada por la Gerencia Legal? <i>Has this request been reviewed by Legal Department?</i>		
Respuesta / Answer	Firma / Signature	Fecha / Date
Yes / No		
Name:		

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ANNEX 2: Guide to Purchase of Goods and Services

1. Objective

This Guide for the Purchase of Goods and Services establishes an internal control and procedure to be followed to identify, evaluate and register all suppliers of goods and services of the Buenaventura Group prior to the initiation or renewal of a commercial relationship. For this purpose, the Logistics area will collect the information from suppliers through a pre-established format and will verify the identity and information provided by them using the Information Verification Mechanisms developed in Annex 2-A. Such supplier verification and registration process will allow the Company to identify "sensitive" suppliers and those for whom it will not be appropriate to initiate or renew a business relationship or for which it will be necessary to implement tailored controls and protections, based on adverse findings or high risks of violation of the Compliance Laws as a result of due diligence.

2. Scope

This Guide applies to the Collaborators of the Buenaventura Group in the Logistics and Compliance area both in Lima and in the Mining Units (including temporary or contract personnel) or others who participate in the function of knowledge, evaluation and registration of suppliers.

3. Procedure

As part of the guideline that fosters "Supplier Knowledge," the Company has established a document that must be completed and signed by the legal representative(s) of each supplier who wishes to initiate or renew (if applicable) their business relationship with the Company, according to the criteria of importance determined by the Company:

3.1 Sworn Statement: "Know Your Supplier" Form³

Once the potential supplier submits the duly completed and signed documentation to the Company, the Logistics area, as applicable, will proceed to:

- Store the documents in the Supplier File.
- Record the information in the corresponding Management System or Module.
- Identify those suppliers with whom:

³See Annex 2-B: Form "Sworn Statement - Know Your Supplier "

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- A business relationship cannot be initiated or renewed (see section 2.1.1. Case of third parties⁴ with whom a business relationship cannot be initiated).
- They are "sensitive" and require validation by Compliance Management (see section 3.2.2. Case of third parties identified as sensitive).
- They are not sensitive (see section 3.2.3. Case of third parties who are "not sensitive").

3.2 Acceptance of third parties

3.2.1. Cases of Third Parties with whom a business relationship cannot be initiated:

In the event that the Logistics area identifies that the third party meets any of the following characteristics, a business relationship cannot be initiated and this will be registered in the list of blocked suppliers:

- That the third party, a Legal Representative, Shareholder, Director or member of Senior Management:
 - Has been convicted of a felony.
 - A negative finding is found in any of the sanctions lists contained in Annex 2-A Verification Mechanisms.

A third party will be of this nature if it has marked at least one answer as "Yes" between questions 15.1 and 16 of the **"Sworn Statement "Know Your Supplier " form⁵**.

3.2.2. Cases of third parties identified as "sensitive"

The Logistics area collaborators are responsible for verifying the information provided by the suppliers of goods and services respectively; and will have, among their tools, an Anti-Corruption software that will provide them with the necessary data to carry out profile and background checks of a third party classified as "sensitive" before starting or renewing a business relationship (due diligence procedure).

"Sensitive" third parties are those who meet one or more of the following characteristics:

- Companies that represent the Company before Public Officials in the development of services related to:
 - Securing permits and licenses
 - Purchase of land from public officials
 - Legal Services

⁴See Section 2 "Definitions" in the Anti-Corruption Policy.

⁵See ANNEX 2-B: Form "Sworn Statement - Know Your Supplier ".

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- Community relations
- Sales contracts with the State
- Customs formalities
- Environmental Services
- Companies with which the signed contract has a value greater than USD 1,000,000,000 and a term greater than 6 months.
- Companies whose key officers (e.g. directors, shareholders, managers or legal representatives) are related to PEPs.
- Companies whose principal officers (e.g. directors, shareholders, managers or legal representatives) have backgrounds in Risk Centers.
- Companies whose principal officers (e.g. directors, shareholders, managers or legal representatives) have preliminary investigations or criminal proceedings in progress.
- Companies receiving transfers from countries considered non-cooperating by the Financial Action Task Force (FATF), countries subject to or sanctioned by the U.S. Treasury Department's Office of Foreign Assets Control (OFAC), or tax havens.
- Companies about which the Logistics area, the Manager and the Compliance and Risk Coordinator or other officials have doubts related to the veracity or congruence of the information provided (e.g. financial information disproportionate to the size and commercial activity of the company).

The identification of the "sensitive" third party is the responsibility of the Logistics area, and the third party will be of this nature if at least one answer has been marked as "Yes" between questions 12 and 15 of **ANNEX 2-B: Sworn Statement Know Your Supplier Form**.

In the event of a "sensitive" third party, the Logistics area, as appropriate, must send its documentation to the Compliance area via e-mail⁶, in order to verify the veracity of the information and the degree of relationship with a PEP, taking as a reference appropriate public information media and information systems⁷.

Once the documentation has been evaluated, the Compliance and Risk Coordinator will present the results of his analysis, with due support, to the Compliance and Risk Manager, who is responsible for approving the start or maintenance of the business relationship with a "sensitive" third party⁸.

If approved, the Compliance and Risk Manager must perform the following activities:

⁶In the case of new suppliers, the email must include the detail of the service to be performed by the supplier, the amount of the contract and the term of execution.

⁷See ANNEX 2-A: Information Verification Mechanisms

⁸ If deemed appropriate, the Corporate Compliance Officer may choose to further evaluate the supplier through external consultants.

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- Communicate to the Logistics area, as appropriate, via email, the acceptance of the business relationship, attaching the conclusions.
- Proceed with the activation of the supplier.
- Store the evidence of the proceedings carried out in the Supplier File.
- Request from the Legal area the inclusion, in the respective contract, of the anti-corruption clause model of the Buenaventura Group, which refers to:
 - i) Commitment to always act honestly.
 - ii) Prohibition of the solicitation or acceptance of bribes of any kind.
 - iii) Obligation to maintain accurate books and records.
 - iv) Commitment to provide information and undergo audits by the Company, if required, in the event of a long-term relationship.

If not approved, the Compliance and Risk Manager must perform the following activities:

- Communicate to the Logistics area, via email, the non-approval of the commercial relationship, attaching the conclusions.
- Register the supplier in the database of blocked suppliers.

3.2.3. Cases of Third Parties that "are not sensitive"

In the event that the Logistics area, as appropriate, identifies that the Third Party is a "non-sensitive" Third Party, it must follow the normal logistics procedures established in the Procedures and Directives for the Acquisition of Goods and Services, respectively, both for the acceptance and non-acceptance of the Third Party.

3.3. Activities to be carried out during the business relationship

3.3.1. Monitor transactional risk during the business relationship

The personnel of the Accounting area and the user areas that manage contracts are responsible for:

- Identifying possible irregularities in the settlements or payment requirements of the suppliers:
 - Reimbursement of additional expenses or fees claimed that do not have a business rationale or reasonable support.
 - Request for payment of unjustified advance payments or payments that were not agreed in the contract.
 - Lack of supporting documentation for the services provided (e.g. lack of service reports).
 - Lack of detail in the breakdown of expenses or fees, or unusual disorder in the supporting documents.
- Ensuring that there is sufficient information for proper accounting of payments made.

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3.3.2. Monitor reputational risk during the business relationship

The Compliance and Risk Manager, with the support of the Compliance and Risk Coordinator, is responsible for performing due diligence at least every two (2) years on active suppliers, following the same procedure for hiring new suppliers established in this Guide; and for inactivating suppliers with no movements during the last 12 months, in which case they must go through a new due diligence before a reactivation.

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ANNEX 2-A: Information Verification Mechanisms

Mechanism	Suppliers and Receiving Entities		Instructions
	Legal Person	Natural Person	
U.S. Department of Justice (DOJ)	X	X	Search for the company/individual name at https://www.justice.gov/
United States Securities and Exchange Commission (SEC)	X	X	Search for the company/individual name at https://www.sec.gov/
Google search	X	X	Analyze the results when searching for the name of the company/individual as well as its shareholders, main managers and legal representatives, and their address on www.google.com with the following search terms: "corrupción", "crimen", "delito", "soborno", "penal", "coima", "fraude", "multas", "lavado de dinero", "incentivos", "donación", "honorario", "descuentos", "propinas", "regalos", "corruption", "corruption", "crime", "bribe", "penalties", "money laundering", "forces", "incentive", "donation", "discount", "compensation", "gratuity", "special payments", "FCPA", "SEC" and "DOJ".
World Bank List of Ineligible Businesses and Individuals	X	X	Search for company/individual name in https://www.worldbank.org/en/projects-operations/procurement/debarred-firms
U.S. Office of Foreign Assets Control (OFAC)	X	X	Search for the company/individual name at https://sanctionssearch.ofac.treas.gov/
International Consortium of Investigative Journalists (ICIJ)	X	X	Search for the company/individual name at https://offshoreleaks.icij.org/
Foreign Corrupt Practices Information Clearinghouse	X	X	Find out if the company/individual name is listed at http://fcpa.stanford.edu/index.html
Consolidated List of the Security Council of the United Nations	X	X	Search for company/individual name in https://www.un.org/securitycouncil/content/un-sc-consolidated-list
European Union Terrorist List	X	X	Search for the name of the company/individual at https://www.consilium.europa.eu/en/policies/fight-against-terrorism/terrorist-list/
List related to the	X	X	Search for the company/individual name at

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Financing of Weapons of Mass Destruction Proliferation of the UN Security Council			https://www.un.org/en/ga/search/view_doc.asp?symbol=S/RES/2356(2017)&referer=/english/&lang=S
Consolidated list on UN Resolution 1718 on the Democratic People's Republic of Korea (North Korea) and Consolidated list on UN Resolution 1737 on Iran	X	X	Search for the name of the company/individual at https://undocs.org/en/S/2009/364 and http://pplaft.cnbs.gob.hn/wp-content/uploads/2015/05/Lista-consolidated-Resoluci%C3%B3n-UN-1737-over-Ir%C3%A1n-Update%C3%B3n-29-October-2014.pdf
List of Non-Cooperating Countries and Territories of the Financial Action Task Force (FATF)			Find the country of domicile of the company/individual at http://www.fatf-gafi.org/publications/high-risk-and-other-monitored-jurisdictions/
Corporate and tax consultation of the company in the country of domicile	X		Analyze the results by searching for the name of the company/individual at https://e-consultaruc.sunat.gob.pe/cl-ti-itmrconsruc/jcrS00Alias or on the respective website of the country of domicile.
Credit Bureau	X	X	Corroborate: <ul style="list-style-type: none"> - Liabilities - Credit History
Judicial Branch	X	X	Corroborate: <ul style="list-style-type: none"> - Police records - Criminal Record

Mechanism	Communal enterprises without international ties		Instructions
	Legal Person	Natural Person	
Google search	X	X	Analyze the results when searching for the name of the company/individual as well as its shareholders, main managers and legal representatives, and their address on www.google.com with the following search terms: "corrupción", "crimen", "delito", "soborno", "penal", "coima", "fraude", "multas", "lavado de dinero", "incentivos", "donación", "honorario", "descuentos", "propinas", "regalos",

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			<p>"corruption", "corruption", "crime", "bribe", "penalties", "money laundering", "forces", "incentive", "donation", "discount", "compensation", "gratuity", "special payments", "FCPA", "SEC" and "DOJ".</p> <p>Individual search of each of the shareholders and key positions of the company for the purpose of verifying that they are not public officials or have findings of corruption.</p>
International Consortium of Investigative Journalists (ICIJ)	X	X	<p>Search for the company/individual name at https://offshoreleaks.icij.org/</p>
Corporate and tax consultation of the company in the country of domicile	X		<p>Analyze the results by searching for the name of the company/individual at https://e-consultaruc.sunat.gob.pe/cl-ti-itmrconsruc/jcrS00Alias or on the respective website of the country of domicile.</p>

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ANNEX 2-B: Know Your Supplier File Form



Form "Affidavit of Knowledge of Supplier"

Compañía de Minas Buenaventura S.A.A. and Subsidiaries

In order to comply with the "Know Your Supplier" guidelines, please complete the following information requirements and return this completed form to us. The information provided will be considered confidential and is considered a sworn statement. Please return it to us duly signed.

1. Identify the company and the legal entities affiliated to your company (for example subsidiaries or companies of the same economic group)

<i>Full name/Company name</i>	<i>Address of main office or main premises</i>	<i>Identity Document/ RUC (Tax Registration Number)</i>	<i>Economic activity and years of experience</i>

2. Identify shareholders who own at least 25% of the Company (*).

<i>Full name/Company name</i>	<i>Identity Document/ RUC (Tax Registration Number)</i>	<i>Nationality/ Country of incorporation</i>	<i>Share Percentage</i>

(*) Include an attached copy of the Shareholders' identity documents

3. Identify the Legal Representatives of the Company (**)

<i>Full name</i>	<i>Identification Document</i>	<i>Nationality</i>	<i>Position</i>

(**) Include an attached copy of the identity documents of the Legal Representatives and Validity of Power of Attorney

4. Identify the members of the Board of Directors or equivalent body of the Company.

<i>Full name</i>	<i>Identification Document</i>	<i>Nationality</i>	<i>Position</i>

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5. Identify the Company's Senior Management (or persons holding similar functions).

<i>Full name</i>	<i>Identification Document</i>	<i>Nationality</i>	<i>Position</i>

6. Provide the names and describe the participation of intermediaries, agents, representatives and others who will act under your direction in the transaction related to Buenaventura.

<i>Full name</i>	<i>Identification Document</i>	<i>Nationality</i>	<i>Position</i>

7. Identify the main legal entities with which you have business relationships (e.g. suppliers, customers)

<i>Company Registered Name</i>	<i>Country</i>	<i>Tax Registration Number</i>	<i>Annual Sales/Purchases s/.</i>	<i>Type of relationship</i>

8. Bank Details:

Bank No. 01 (insert bank name)
Account Type
Soles Account No.
Dollar Account No.

Bank No. 02 (insert bank name)
Account Type
Soles Account No.
Dollar Account No.

Other Banks (insert bank name)
Name of Bank

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Account Type
Soles Account No.
Dollar Account No.

Banco de la Nación – Detraction (in Peru)
Soles Account No.

9. Company Financial Information:

Total Assets in S/:	
Total Equity in S/.	
Annual Sales Volume in S/.	
Net Income in S/.	
Number of employees	

10. Does your Company have a Code of Conduct or Ethics to ensure compliance with all applicable laws or regulations and to ensure appropriate and ethical business conduct?

Yes No

11. Indicate if the Company is a Regulated Entity and if so, that it has a Compliance Officer registered with the FIU-Peru.

Yes No

12. Are any of the Directors, Shares, Managers, Legal Representatives or principal employees who will work on the project or service a person classified as a Politically Exposed Person (PEP)** * or related to them?

Yes No

If your answer is yes:

12.1 Indicate:

<i>Full name</i>	<i>Identification Document</i>	<i>Position</i>	<i>Detail</i>

Include the full names of the relatives up to the second degree of consanguinity and second degree of affinity.
Include the name of the spouse or cohabitant.

*** **Politically Exposed Persons (PEP):** Natural persons who hold or have held prominent public functions in the last (5) years, or are candidates for political office, either in the national territory or abroad.

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This includes relatives up to the second degree of consanguinity and second degree of affinity and the spouse.

12.2 Confirm that:

The Politically Exposed Person (PEP), in his/her capacity as a public official, is **NOT** in a position of conflict of interest in the exercise of his/her functions, as there is no known pending or future transaction or procedure between the Company and the institution in which he/she works, on which the public official would have to make decisions.

Yes No

13. Does the company or any of its Legal Representatives, Shareholders, Directors or Managers have a negative history in Risk Centers?

Yes No

If yes, please indicate:

Full name	Identification Document	Position	Detail

14. Has the company or any of its Legal Representatives, Shareholders, Directors or Managers been convicted or have preliminary investigations or criminal proceedings in progress?

Yes No

If yes, please indicate:

Full name	Identification Document	Position	Detail

14.1 Was the offense for which they were convicted malicious?

Yes No

15. Are any of its managers, employees, intermediaries, agents, directors or legal representatives a Public Official or have they been in the past?

Yes No

16. Does the company sell, or has it sold, goods or services to state institutions such as local or regional governments, or to the national or foreign central government, or to International Organizations?

Yes No

17. Will the transaction related to Buenaventura involve meetings or communications with a public official?

Yes No

18. Has the company paid commissions to third parties for obtaining contracts with the State in the last 24 months?

Yes No

If your answer is yes, who was paid and how were these payments recorded?

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19. Does the company or any of its officers/employees currently have, or has it had, any business or other relationship with Compañía de Minas Buenaventura S.A.A. and subsidiaries or with any of its officers/employer?
 Yes No

If your answer was yes, please give details of this relationship:

20. Does the company or any of its officers / employees have any conflict of interest with Compañía de Minas Buenaventura? Conflict of interest means a family relationship with any official/employee of Compañía de Minas Buenaventura and/or subsidiaries or the provision of services in conflict with those of Compañía de Minas Buenaventura and/or subsidiaries.

Yes No

If yes, please explain the conflict of interest:

Can you or your company provide any special information through which Compañía de Minas Buenaventura S.A.A. may benefit or have connections (ties), with friends or family in the government or in others?

Yes No

If your answer is yes, please give details of this information:

Certification, Authorization and Communication

I declare under oath that the data and other information contained in this document are true and current, and if the statement made is false, I will be subject to the corresponding administrative and/or criminal responsibilities.

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Full name	
Position	
Company	
Date	

Signature

Regulatory Compliance Form Referring to:

- FCPA: Law Against Foreign Corruption Practices (USA).
- SPLAFT: Law No.27693 and amendments, Law that creates the Financial Intelligence Unit – Peru, Resolution SBA 789-2018
- PREVENTION OF CORRUPTION: Law No.30424 and DL No. 1352, Law and DL that regulates the Administrative Responsibility of Legal Persons, Supreme Decree No. 002-2019-JUS

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ANNEX 2-B-1: Supplier Certification

	ANNEX A / EXHIBIT A SERVICE PROVIDER CERTIFICATION/ SERVICE PROVIDER CERTIFICATION
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 ANEXO A / EXHIBIT A CERTIFICACIÓN DE PROVEEDOR DE SERVICIOS / SERVICE PROVIDER CERTIFICATION	
DEFINICIONES	DEFINITIONS
<p>La “Ley contra las Prácticas Corruptas en el Extranjero” o “FCPA” hace referencia a una ley de los EE. UU. que se aplica globalmente y torna ilegal el hecho de que cualquier persona o individuo estadounidense o extranjero, quien por realizar actividades comerciales o de otro tipo (sea en los EE.UU. o en otro país) se encuentre sujeto a la jurisdicción de los EE.UU., y que en forma corrupta pague, prometa, autorice u ofrezca pagar o dar cualquier cosa de valor, directa o indirectamente, a un funcionario público no estadounidense, a un partido político o a un funcionario de un partido no estadounidense o a un candidato a un cargo público a los fines de obtener o retener un negocio, dirigir un negocio u obtener una ventaja comercial inapropiada.</p> <p>“Algo de Valor” hace referencia a cualquier tipo de beneficio e incluye mas no se limita a:</p> <ul style="list-style-type: none"> • Dinero (incluidos descuentos o créditos) • Servicios: atención médica, mejoras del hogar, educación, tratamientos de spa • Regalos: joyas, ropa, arte, automóviles, equipos • Donaciones: contribuciones políticas, pago de hipotecas, alquileres de automóviles • Contribuciones de caridad a una organización en la cual esté involucrado un Funcionario de Gobierno • Viajes: vacaciones o viáticos para el funcionario, su familia o amigos • Oportunidades de inversión (por ejemplo: “empresas conjuntas”), oferta de empleos <p>“Familiares” hace referencia a una de las siguientes relaciones: madre, padre, cónyuge, pareja de unión civil, hermano(a), hijo(a), nieto(a), abuelo(a), tío(a), sobrino(a); cualquiera de los anteriores que fuera aplicable, que sean padrastro, madrastra, hijastro(a); suegro(a), cuñado(a), yerno y nuera.</p> <p>“Funcionario Público” significa: (1) cualquier funcionario o empleado de una entidad gubernamental, departamento de</p>	<p>“Foreign Corrupt Practices Act” or “FCPA” means the U.S. law applicable globally, that makes it unlawful for any US or foreign entity or individual, who because of their commercial or other activities (either in the US or in any other country) become subject to the jurisdiction of the United States, to corruptly pay, promise, authorize, or offer to pay or give anything of value, directly or indirectly, to any non-U.S. government official, to any non-U.S. political party or party official, or to any candidate for public office in order to obtain or retain business, to direct business, or to gain an improper business advantage.</p> <p>“Anything of Value” means any type of benefit and includes but is not limited to:</p> <ul style="list-style-type: none"> • Money (including discounts or credit) • Services: healthcare, home improvement, education, spa treatments • Gifts: jewelry, clothes, art, cars, equipment • Donations: political contributions, payment of mortgages, car leases • Charitable contributions to an organization in which a Government Official is involved • Travel: vacations for the official, his/her family or friends or per diems • Investment opportunities (e.g., “joint ventures”), offer of employment <p>“Family Members” means one of the following relationships: mother, father, spouse, civil union partner, sister, brother, son, daughter, grandchild, grandparent, aunt, uncle, nephew, niece, any of the preceding who where applicable who are “step” relatives, mother-in-law, father-in-law, sister-in-law, brother-in-law, son-in-law, and daughter-in-law.</p> <p>“Government Official” means: (1) any officer or any employee of a government entity, government department, or government agency; (2) any officer or any employee of a commercial enterprise that is fully or partly government</p>

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gobierno o agencia de gobierno; (2) cualquier funcionario o empleado de una empresa comercial que sea completa o parcialmente propiedad del gobierno o que esté bajo su control; (3) cualquier funcionario o empleado de una organización internacional pública como el Fondo Monetario Internacional, la Organización Mundial de la Salud y el Banco Mundial u otras similares; (4) cualquier funcionario de un partido político o cualquier partido político; (5) cualquier candidato a un cargo político; (6) los individuos que actúen en nombre de cualquiera de los individuos u organizaciones enumerados anteriormente o (7) cualquiera que sea considerado un representante de gobierno (un sujeto o entidad contratada por un gobierno y que desempeña una función que dicho gobierno trate como propia).

“**Representantes**” significa los directores, funcionarios, empleados, contadores, abogados, consultores, asesores, agentes y otros terceros representantes de Compañía de Minas Buenaventura (“BVN”).

“**Política Anticorrupción del Grupo Buenaventura**” establece las políticas de cumplimiento corporativo y anticorrupción, incluida la prohibición a cualquier persona de dar, ofrecer o aceptar, de manera directa o indirecta, Algo de Valor para o de un Funcionario Público o persona privada con el objetivo de obtener o retener un negocio o asegurar una ventaja indebida, pudiendo esta política ser modificada cada cierto tiempo.

“**Proveedor**” significa cualquier persona o entidad que se encuentre directa o indirectamente involucrada en proporcionar bienes y/o servicios de cualquier tipo a BVN, comprendiendo a cualquier tercero que trabaje en representación o asociación con el Proveedor, incluyendo, sin limitación alguna:

- Agentes de aduanas;
- Transportistas;
- Consultores;
- Agentes de viajes;
- Abogados.

El **Decreto Legislativo peruano N° 1352 - “que amplía la Responsabilidad Administrativa de las Personas Jurídicas”** (en adelante el “DL 1352”). Modifica a la Ley 30424 – “Ley que Regula la Responsabilidad Administrativa de las Personas Jurídicas por el Delito de Cohecho Activo Transnacional”.

El **DL 1352** sanciona a las personas jurídicas (“PJ”) por los

owned or controlled; (3) any officer or employee of a public international organization such as the International Monetary Fund, the World Health Organization, and the World Bank, or others alike; (4) any political party official or political party; (5) any candidate for a political office; (6) any individual who acts on behalf of any of the above listed organizations or individuals, or (7) anyone that may be considered a government instrumentality (a person or entity controlled by a government and that performs a function the controlling government treats at its own).

“**Representatives**” means the directors, officers, employees, accountants, counsel, consultants, advisors, agents, and other third-party representatives of Compañía de Minas Buenaventura (“BVN”).

“**BVN Anti-Corruption and Corporate Compliance Policy**” shall mean the BVN policy setting forth the anti-corruption, anti-money laundering and corporate compliance policies of BVN, including prohibiting any person from making, offering or accepting, either directly or indirectly, Anything of Value to or from any Government Official or private party for the purpose of obtaining or retaining business or securing an improper business advantage, as it may be amended from time to time.

“**Service Provider**” shall mean any party that may be directly or indirectly involved in the provision of goods and/or services of any type to BVN, including anyone working on behalf or in association with the Service Provider, such as, for example without limitation, the following:

- Custom brokers;
- Freight forwarders;
- Consultants;
- Travel agents;
- Lawyers.

Peru’s Legislative Decree No. 1352 - “which broadens the Administrative Responsibility of Legal Entities” (hereinafter “LD 1352”). Modifies Law No. 30424, the “Law that Regulates the Administrative Responsibility of Legal Entities for the Crime of Transnational Bribery”.

LD 1352 penalizes legal entities (“LE”) for the crimes of (i) bribery, (ii) transnational bribery and (iii) specific bribery, as well as (a) conversion and transfer of money or property of illicit origin; (b) concealment and possession of money or

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delitos de **(i)** cohecho activo genérico, **(ii)** cohecho activo transnacional y **(iii)** cohecho activo específico, así como por **(a)** conversión y transferencia de dinero o bienes de origen ilícito; **(b)** ocultamiento y tenencia de dinero o bienes de origen ilícito, **(c)** transporte, traslado, ingreso o salida por el Perú de dinero o títulos valores de origen ilícito; y **(d)** financiamiento, provisión o recolección de fondos para actos terroristas en el Perú (en adelante los delitos de cohecho).

De acuerdo al DL 1352, las PJ son responsables por los delitos mencionados cuando han sido cometidos en su nombre o por cuenta de la PJ, sus afiliadas y subsidiarias por:

- Sus socios, directores, administradores, representantes legales o apoderados;
- Personas naturales sometidas a autoridad y control de los representantes de la PJ, que hayan cometido el delito bajo sus órdenes o autorización.
- Personas naturales, cuando los representantes de la PJ han incumplido sus deberes de supervisión, vigilancia y control sobre la actividad encomendada.

Las Matrices son responsables y serán sancionadas cuando las personas naturales de sus filiales o subsidiarias hayan cometido los delitos bajo sus órdenes o consentimiento; a no ser que estas hayan actuado exclusivamente en beneficio propio o de un tercero distinto a la PJ.

La "Resolución SBS 789-2018" establece la obligación de implementar un Sistema de Prevención del Lavado de Activos y del Financiamiento del Terrorismo (SPLAFT) mediante la gestión de los riesgos de lavado de activos y financiamiento del terrorismo. Esta norma incluye bajo su alcance a las empresas mineras que realizan compraventa, exportación definitiva o importación de oro en bruto o semielaborado, así como el obtenido producto directo de un proceso minero o metalúrgico, por lo cual es aplicable a BVN.

"Persona Jurídica – PJ" son las entidades de derecho público o privado, asociaciones, fundaciones, ONGs, comités no inscritos, sociedades irregulares, entes administradores de patrimonios autónomos, empresas del Estado peruano o sociedades de economía mixta.

"Cohecho activo genérico" significa el ofrecimiento, entrega o promesa a un funcionario público de un donativo, promesa, ventaja o beneficio para que realice u omite actos faltando o no a sus obligaciones.

"Cohecho activo transnacional" significa el ofrecimiento,

property of illicit origin; **(c)** transportation, transfer, entry or exit to Peru of currency or securities of illicit origin; and **(d)** financing, provisioning or collecting funds for terrorist acts in Peru (hereinafter the "bribery crimes").

According to LD 1352, LEs are held responsible for the crimes mentioned when committed on their behalf or on the account of the LE, its affiliates and subsidiaries by:

- Its shareholders, directors, managers or legal representatives;
- Individuals subject to the authority and control of the LE representatives, who have committed the crime under their orders or authorization.
- Individuals, when the representatives of the LE have not complied with their duties of supervision, oversight and control over the entrusted activities.

Head offices are responsible and will be sanctioned when individuals from their affiliates or subsidiaries have committed the crimes under their direction or consent; unless they have acted exclusively for their own or for a third party's benefit different from the LE.

"SBS Resolution 789-2018" establishes the obligation to implement a System for the Prevention of Money Laundering and Terrorism Financing (SPLAFT) by managing money laundering and terrorist financing related risks. This regulation includes under its scope mining companies that carry out the sale, final export or import of raw or semi-finished gold, as well as the direct product obtained from a mining or metallurgical process, and is thereby applicable to BVN.

"Legal Entity - LE" are public or private entities, associations, foundations, NGOs, non-registered committees, irregular companies, autonomous wealth managers, Peruvian state companies or mixed economy companies.

"Bribery" means the offer, delivery or promise to a public official of a donation, promise, advantage or benefit so that he can perform or omit acts, whether or not they are in breach of his obligations.

"Transnational bribery" means the direct or indirect offer, grant or promise to a public official of a country other than Peru or of an international organization of a donation, promise, advantage or benefit to perform or omit acts, whether or not they are in breach of his obligations, for the

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<p>otorgamiento o promesa directa o indirecta a un funcionario público de un país diferente a Perú o de un organismo internacional de un donativo, promesa, ventaja o beneficio para que realice u omite actos, faltando o no a sus obligaciones, a efectos de obtener o retener un negocio o ventaja indebida.</p> <p>“Cohecho activo específico” cuando se ofrece, da o promete un donativo, ventaja o beneficio a un magistrado, fiscal, perito, árbitro, miembro de tribunal administrativo (o análogo), secretario, relator, especialista, auxiliar administrativo, testigo, traductor o intérprete para influir en la decisión de un asunto sometido a su conocimiento o competencia.</p> <p>Lavado de activos - LA es el proceso mediante el cual criminales disfrazan la propiedad original y el control de las ganancias de una conducta criminal dando la apariencia de que dichas ganancias proceden de una fuente legítima.</p> <p>“Financiamiento del terrorismo - FT” es el apoyo encubierto - financiero o de otro tipo- a organizaciones terroristas o a aquellas personas que promueven o se encuentran involucradas en estas actividades.</p> <p>“Operación inusual” es aquella cuya cuantía, características particulares y periodicidad no guarda relación con la actividad económica de una empresa, sale de los parámetros de normalidad vigentes en el mercado, o no tiene un fundamento real evidente.</p> <p>“Operación sospechosa” es aquella operación inusual, realizada o que se pretenda realizar, de cualquier naturaleza, que tenga una magnitud o velocidad inusual, en condiciones de complejidad inusual o injustificada, que en base a la información recopilada a partir de una revisión de debida diligencia a un cliente, se presume que procede de alguna actividad ilícita o que no tiene un fundamento económico o legal aparente; y que podría estar vinculadas al lavado de activos o al financiamiento del terrorismo.</p>	<p>purpose to obtain or retain a business or undue advantage.</p> <p>“Specific bribery” occurs when the solicitation, acceptance, or transfer of Anything of Value involves a magistrate, prosecutor, expert, arbitrator, member of administrative court (or analogous), secretary, rapporteur, specialist, administrative assistant, witness, translator or interpreter, and is made in exchange for an action or inaction within the knowledge, competence or scope of any of them.</p> <p>“Money Laundering - ML” is the process by which criminals disguise the original ownership and control of the proceeds of criminal conduct by making such proceeds appear to have derived from a legitimate source.</p> <p>“Terrorism Financing - FT” is the covert support - financial or otherwise, in any form or modality - to terrorist organizations or to those who promote or are involved in these activities.</p> <p>“Unusual Transaction” is such which quantity, particular characteristics and periodicity is not related to the economic activity of a company, falls outside regular and current market parameters or does not have an evident real basis.</p> <p>“Suspicious Transaction” is an unusual transaction performed or intended to be performed, of any nature, having an unusual velocity or magnitude; in conditions of unusual or unjustified complexity; which based on information gathered and analyzed during client due diligence, it is presumed to be sourced from illegal activities or from no apparent legal or economic basis; and which could be linked to the laundering of assets or the financing of terrorism.</p>
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CERTIFICACIÓN	CERTIFICATION
<p>Esta Certificación ("Certificación") es hecha por el Proveedor que la suscribe, quien se compromete a lo siguiente:</p> <p>a. El Proveedor no hará ninguna promesa, ofrecimiento, ni autorizará ningún pago o transferencia de Algo de Valor, directa o indirectamente, a ningún Funcionario Público con la finalidad de (i) influir sobre dicho funcionario para que emprenda acciones, tome decisiones u omita emprender acciones, en su capacidad de funcionario, (ii) inducir a dicho funcionario a que utilice su influencia con un gobierno o representante del mismo para influir en cualquier acto o decisión del gobierno o representante, u (iii) obtener cualquier ventaja inapropiada prohibida por la FCPA o la legislación peruana.</p> <p>b. El Proveedor garantiza estar en total cumplimiento con las disposiciones de la FCPA, el Decreto Legislativo No. 1352, la Resolución SBS 789-2018 y demás normativa relacionada con la lucha contra la corrupción, el lavado de dinero y el financiamiento del terrorismo, así como que el Proveedor se mantendrá en cumplimiento de las mismas, en la medida en que estas regulaciones sean legalmente vinculantes para el Proveedor.</p> <p>c. El Proveedor se asegurará de que sus empleados, consultores, agentes y representantes no realicen pagos o transferencias a ningún Funcionario Público que infrinjan la FCPA, el DL 1352, la Resolución SBS 789-2018 o las leyes del país en el que se realizó el pago o la transferencia.</p> <p>d. El Proveedor garantiza que, en relación con la provisión de bienes y servicios a BVN, ya sea actualmente o en el futuro, cumplirá en todo momento con las disposiciones de la FCPA, el DL 1352, la Resolución SBS 789-2018 o cualquier ley anticorrupción de la jurisdicción en que opera, y la Política de Cumplimiento Corporativo y Anticorrupción de BVN, que el Proveedor de servicios puede obtener en la página web de BVN o solicitando el mismo a BVN.</p> <p>e. BVN y sus Representantes tendrán el derecho de realizar una auditoría financiera, fiscal, regulatoria, legal y del negocio del Proveedor, así como con respecto a sus funcionarios, empleados, propietarios y representantes, según sea necesario para verificar el cumplimiento del Proveedor con esta Certificación, lo cual se relaciona con la prestación de bienes y/o servicios a BVN. El Proveedor</p>	<p>This Certification ("Certification") is made by the Service Provider set forth below, who hereby agrees as follows:</p> <p>a. Service Provider will not make, promise, offer, or authorize any payment or transfer of Anything of Value, directly or indirectly, to any Government Officials for the purpose of (i) influencing such official to take any action or decision or to omit to take any action, in his official capacity, (ii) inducing such official to use his or her influence with a government or instrumentality to affect any act or decision of the government or instrumentality, or (iii) securing any improper advantage as proscribed by the FCPA and Peru's legislation.</p> <p>b. Service Provider warrants to be in full compliance with the provisions of the FCPA, Legislative Decree No. 1352, SBS Regulation 789-2018 and related anti-corruption, anti-money laundering and terrorism financing regulations, and that Service Provider will remain in compliance thereunder, to the extent these regulations are legally binding upon Service Provider.</p> <p>c. Service Provider will ensure that its employees, consultants, agents and representatives do not make any payments or transfers to any Government Officials that would violate the FCPA, DL 1352, SBS Resolution 789-2018 or the laws of the country in which payment or transfer were made.</p> <p>d. Service Provider warrants that in connection with its provision of goods and services to BVN, whether presently or in the future, that it will comply at all times with the provisions of the FCPA, DL 1352, SBS Resolution 789-2018 or any anti-corruption law of the jurisdiction in which it operates, and BVN' Anti-Corruption and Corporate Compliance Policy, which Service Provider can obtain from BVN's webpage or upon request to BVN.</p> <p>e. BVN and its Representatives shall be entitled to conduct a business, financial, tax, regulatory and legal due diligence review of Service Provider, and its officers, employees, owners, and representatives as may be necessary to ensure Service Provider's compliance with this Certification as it relates to Service Provider's participation in the provision of goods and/or services to BVN. Service Provider shall fully cooperate with BVN in</p>

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<p>acuerda cooperar plenamente con BVN en dicha auditoría y pondrá a disposición de BVN y sus Representantes mediante aviso por escrito con tres (3) días de anticipación por parte de BVN, acceso a (i) libros, registros y demás información del negocio del Proveedor, (ii) sus funcionarios, empleados, propietarios y representantes, y (iii) las oficinas, propiedades e instalaciones. BVN tendrá derecho a hacer copias de todos los documentos que revise.</p> <p>f. El Proveedor certifica que el representante que suscribe la presente Certificación cuenta con facultades suficientes para obligarlo en los términos aquí previstos.</p>	<p>such due diligence review, and shall make available to BVN and its Representatives upon three (3) days prior notice by BVN, access to Service Provider's (i) books, records, and other business information; (ii) officers, employees, owners, and representatives; and (iii) offices, properties, and facilities. BVN shall be entitled to make copies of all documentation reviewed.</p> <p>f. Service Provider further certifies that its representative herein has sufficient authority to bind it pursuant to the terms of this Certification.</p>
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Nombre del Proveedor / Name of Service Provider:
Dirección / Address:
Teléfono y Página Web / Telephone and Website:
Descripción de los Bienes y/o Servicios prestados a BVN / Description of goods and/or services provided to BVN:
Nombre Completo y Cargo de Representante del Proveedor/ Full Name and Position of Service Provider Representative:
Firma / Signature:
Fecha / Date:

ANNEX 3: Statement of Knowledge and Compliance with the Anti-Corruption Policy by collaborators

TO: HUMAN RESOURCES MANAGEMENT/COMPLIANCE AND RISK MANAGEMENT

FROM:

Paternal surname Maternal surname, First name(s)

Unit

Work Area

DATE:

I hereby declare that I have read and fully understand the Anti-Corruption Policy (the Policy) of Compañía de Minas Buenaventura S.A.A. and subsidiaries (hereinafter the Company)

Therefore, I agree to comply with the provisions and I declare to know that any attitude or action that is against this Policy, is subject to sanctions and disciplinary measures that may include separation from the Company, within the current legal framework.

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Likewise, I am aware of the obligation to report the identification of any non-compliance with the provisions of the Policy, which must be communicated to the Compliance Officer or the Ethics Officer, through the means authorized by the Company (such as the Corporate Ethics Line, by telephone, email and website).

I also declare that I am aware of the provisions of the Anti-Corruption Policy, and declare under oath that I am not a public official as defined therein, nor do I have a relationship up to the second degree of consanguinity, second degree of affinity or by reason of marriage or cohabitation, with any public official, otherwise I will immediately inform the Company.

Collaborator's signature

ANNEX 3-A: Statement of Knowledge and Compliance with the Anti-Corruption Policy by members of the Board of Directors

TO: HUMAN RESOURCES MANAGEMENT/COMPLIANCE AND RISK MANAGEMENT

FROM:

Paternal surname Maternal surname, First name(s)

DATE:

I hereby declare that I have read and fully understand the Anti-Corruption Policy (the Policy) of Compañía de Minas Buenaventura S.A.A. and subsidiaries (hereinafter the Company)

Therefore, I agree to comply with the provisions and I declare to know that any attitude or action that is against this Policy, is subject to sanctions and disciplinary measures that may include separation from the Company, within the current legal framework.

Likewise, I am aware of the obligation to report the identification of any non-compliance with the provisions of the Policy, which must be communicated to the Compliance Officer or the Ethics Officer, through the means

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authorized by the Company (such as the Corporate Ethics Line, by telephone, email and website).

I also declare that I am aware of the provisions of the Anti-Corruption Policy and Corporate Compliance Policy, and declare under oath that I am not a public official as defined therein, nor do I have a relationship up to the second degree of consanguinity, second degree of affinity or by reason of marriage or cohabitation, with any public official, otherwise I will immediately inform the Company.

Signature of the member of the Board of Directors

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ANNEX 4: Affidavit of Adherence to and Compliance with the Business Partner's Anti-Corruption Policy

Sir or Madam

Compañía de Minas Buenaventura S.A.A. and subsidiaries (hereinafter, the COMPANY)

Hereby:

- i) We declare that we have received, read and understood the COMPANY's Anti-Corruption Policy.
- ii) We undertake to respect and observe the guidelines for action described in paragraph 3 of the COMPANY's Anti-Corruption Policy.
- iii) We declare that the owner(s), shareholder(s) and/or final beneficiary(s) of our company does not have the status of public official under the definition established in the COMPANY's Anti-Corruption Policy, nor do they have kinship to the second degree of consanguinity, second degree of affinity or by reason of marriage or cohabitation, with any public official. Otherwise, it will be immediately communicated to the COMPANY.

Signature of the legal representative of the business partner

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ANNEX 5: Guidelines for interaction with Public Officials

1. General provisions on interaction with public officials

- 1.1. These guidelines are intended to establish the appropriate way to interact with Public Officials, in line with current legislation. Therefore, the leadership and respect of the national, international and internal policies of Grupo Buenaventura is one of the pillars of the Company.
- 1.2. Grupo Buenaventura recognizes the right of natural and legal persons to initiate communication and/or dialogues with Public Officials. In this sense, it promotes that all communication with Public Officials carried out by its collaborators is within the framework of a legitimate dialogue.
- 1.3. Legitimate dialogue is the basis of communication with Public Officials and must be the subject of the actions of the collaborators of Grupo Buenaventura. For this, the concurrence of "legitimate reason", "suitable interlocutor" and "appropriate form" must be taken into account.
- 1.4. The employees of Grupo Buenaventura will take into account the following general guidelines of conduct:
 - i. In meetings with Public Officials, at least two employees or representatives of Grupo Buenaventura must participate.
 - ii. Meetings must be held at the office of the Public Official or at the facilities of Buenaventura Group.
 - iii. If applicable, the Public Officer must be informed that there is a conflict of interest in relation to any of the participants in the meeting.
 - iv. The request for a meeting by a Public Official to an employee of Buenaventura Group must be informed and authorized in advance and in writing by the head or direct manager.
 - v. If the employee identifies in the conversation what could constitute an intention of suspicious activity or corruption, the employee must redirect the conversation to the topics that are part of the legitimate dialogue. If the suspicious act persists, the employee of Grupo Buenaventura must end the conversation and communicate the fact through the Whistleblower Channel of Grupo Buenaventura to keep a record of it and take appropriate action. Communications between a Buenaventura Group employee and a Public Official must be formal and in clear language, following the appropriate protocols, respecting the investiture of the authority. Making or accepting offers of undue advantage to or from business partners is prohibited.
 - vi. All legal tools and training provided by Grupo Buenaventura should be used to carry out formalities or procedures with government entities and use the formal means of

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communication of these entities. Only in strictly necessary and exceptional cases may analogous means be used, always specifying the purpose of the communication.

- vii. The area that interacts with the Public Official must keep a record and copy of the files and all types of documentation that has been sent to the various entities of the State, which will be available to the Compliance and Risks area when requested.

2. Visits by Public Officials to the Buenaventura Group

- 2.1. When a public official from any government agency visits the facilities of Grupo Buenaventura, the employee receiving the visit must immediately inform the direct manager and/or the person responsible for receiving the visit.
- 2.2. When a Public Official comes to the company to carry out an inspection, review or unannounced visit, he/she should be, whenever possible, accompanied by at least two employees. Exceptionally, due to the circumstances of the moment, the immediate superior may verbally authorize that he/she be attended individually.
- 2.3. Buenaventura Group employees accompanying the Public Official during the development of the procedure that motivates their visit, may not grant any benefit, promise or economic advantage or otherwise.

3. Visits of Grupo Buenaventura employees to Public Entities

- 3.1. In meetings in Public Entities attended by Grupo Buenaventura, at least two employees must participate. Exceptionally, only one collaborator may participate, with authorization from the immediate boss.
- 3.2. Buenaventura Group employees who attend the visit with the Public Official may not request or receive any advantage or benefit from the Entity, suggesting preferential treatment.

4. Responding to requests for extortion payments

- 4.1. When a Buenaventura Group employee is faced with a scenario of economic extortion by a Public Official, in principle, he/she should act as follows:
 - i. Notify the Public Official that he/she will not be able to attend to the requirement since it is contrary to the Grupo Buenaventura policy.
 - ii. Terminate the meeting or visit and communicate the fact to their immediate superior.
- 4.2. If, because of the exceptional context, the employee perceives that not agreeing to the

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extortion payment may endanger their well-being and safety, they should never put themselves at risk and should take reasonable measures for their safety and may exceptionally agree to the payment. This fact must be communicated immediately to the immediate superior, providing the necessary data to identify the public official, such as their name, the institution to which they belong, date, time and place of the incident, in other data.

5. Provisions on the use of communication channels

5.1 As a general rule, preference should be given to the use of the appropriate channel for dialogue, which will always be the official channel established by the Public Entity. This means that:

- i. Personal meetings must be held in the office of the Public Official;
- ii. Emails, messages or correspondence must be addressed to the official addresses or official email of the Public Official;

5.2. Exceptionally, only when the Public Official does not have the official means of communication or in an emergency situation, the use of non-official or even private means may be chosen, such as:

- i. Message exchanges via WhatsApp or SMS;
- ii. Calls to the personal cell phone of the Public Official;

5.3. Likewise, dialogue may not be restricted if, due to special circumstances of place, time and situation, the communication must be made in places other than the offices of the Public Official, such as restaurants, hotels, airports, or social events. In such cases, it is imperative that the contributor to Grupo Buenaventura ensures the legitimate reason for the dialogue.

5.4. In the event that the collaborator communicates with a Public Official through an unofficial channel, such as text messages (SMS or WhatsApp) and/or emails received or sent, they must make them available to their immediate boss, who must preserve them for up to 4 years in a format that allows easy access and review.

6. Record of interaction

6.1 In the following cases, in addition to observing the action guidelines previously developed, the collaborator must complete and deliver to the Compliance and Risks area the "Act of Interaction with Public Officials":

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- When in the interaction with the Public Official there is an unusual or suspicious situation that allows to infer, according to the circumstances, that there is a request or attempt of bribery and/or economic extortion.
- When interactions with Public Officials occur in a context of crisis and/or matters of special importance for Grupo Buenaventura.

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ANNEX 5-A: Minutes of interaction with Public Officials

1. INTERACTION	
Applicant:	
Date:	Start time: End time:
Place:	Method used:
TOPICS COVERED	
a)	
b)	
c)	
d)	

3.	
BUENAVENTURA GROUP	
Name	Position
Public Entity	
Name	Position

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4.	

5. ANNEXES (Presentations, others			
Collaborator Participant 1		Signature	
Collaborator Participant 2		Signature	
Collaborator Participant 3		Signature	

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ANNEX 6: Guidelines for interaction with business partners

1. Principles of interaction

- 1.1 The relationship with Grupo Buenaventura's business partners is the main object of these guidelines, based on the fact that they are the strategic allies for the achievement of the objectives outlined. In this sense, it is important to maintain an adequate interaction with them, which requires Grupo Buenaventura to have and maintain bonds of trust in each activity it carries out.
- 1.2 With these guidelines, it is expressly established that Grupo Buenaventura shares the ethical, social, environmental and gender equality, health and safety criteria; basic factors for fair operating practices in the procurement processes of goods, services and, in general, in all contractual and negotiation areas.
- 1.3 Grupo Buenaventura recognizes that dialogue with its business partners is an essential factor for good business relations with them. In this sense, it promotes that any communication that is made with commercial partners of Grupo Buenaventura is within the framework of a legitimate dialogue.
- 1.4 Legitimate dialogue is the basis of communication with the business partner and must be a prerequisite for the actions of the employees of Grupo Buenaventura. In order to know when the dialogue is legitimate, the existence of a legitimate reason, suitable interlocutors and appropriate form must be taken into consideration.
- 1.5 The employees of Grupo Buenaventura will take into account the following general guidelines of conduct:
 - In meetings with business partners, at least two employees or representatives of Grupo Buenaventura must participate.
 - As a general rule, meetings must be held at the facilities of Grupo Buenaventura, or at those of the business partner. Exceptionally, meetings may be held in places other than the facilities of the parties, which must be communicated to the Compliance and Risks area through the "Act of Interaction with Business Partners":
 - If applicable, the worker or representative of Grupo Buenaventura must communicate if there is a conflict of interest with respect to any of the participants in the meeting.

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- If the employee identifies in the conversation what could constitute an intention of suspicious activity or private corruption, the employee must redirect the conversation to the topics that are part of the legitimate dialogue. If the suspicious act persists, the employee of Grupo Buenaventura must end the conversation and communicate the fact through the Whistleblower Channel of Grupo Buenaventura to keep a record of it and take appropriate action.
- Making or accepting offers of undue advantage to or from business partners is prohibited.
- The business partner should not be allowed to assume attitudes that may affect the legitimate dialogue, in which situation he/she will be informed of the need to respect the Code of Conduct for Business Partners. If their attitude persists, it will be communicated that the interaction will not be able to continue and will be resumed at a later date.
- The worker must ensure that the interaction with the business partners of Grupo Buenaventura is efficient, for which he may request meetings or have off-site conversations within the framework of his functions and within the framework of a legitimate dialogue. All workers must start from the premise that the interaction does not allow them to receive gifts, invitations or incentives from the business partner that involve an alteration or conditioning of the normal development of the commercial relationships that they have or seek to have.

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ANNEX 6-A: Minutes of interaction with business partners

6. INTERACTION		
Applicant:		
Date:	Start time:	End time:
Place:		Method used:
TOPICS COVERED		
a)		
b)		
c)		
d)		

8.		
BUENAVENTURA GROUP		
Name	Position	
BUSINESS PARTNERS		
Name	Position	

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9.	

10. ANNEXES (Presentations, others			
Collaborator Participant 1		Signature	
Collaborator Participant 2		Signature	
Collaborator Participant 3		Signature	