

The present compliance policy is applicable to **BRIDGESTONE MINING SOLUTIONS PERÚ SAC** (from now on "**BMSP**"), which permanently sets and presents a high commitment with the development of commitment with the development of activities with the maximum level of ethics and compliance with current legislation.

At BMSP we are firmly committed to combating bribery, influence peddling, collusion, money laundering and terrorist financing (from now on "**the crimes**") by establishing principles that guide the behavior of all our members and business partners.

BMSP strictly prohibits bribery in any form, including directly or indirectly, through an agent or other third party, either in relation to a public official or a natural person, as well as participating in any situation that may result in situations of traffic of influence, collusion, money laundering or financing of terrorism.

In that sense, our policy contemplates our commitment against the commission of the following crimes:

- Transnational active bribery (Art. 397-A of the Criminal Code).
- Generic active bribery (Art. 397 of the Penal Code).
- Specific active bribery (Art. 398 of the Criminal Code).
- Collusion (Art. 383 of the Criminal Code).
- Influence trafficking (Art. 499 of the Criminal Code).
- Money laundering (Art. 1, 2, 3, 4 of Legislative Decree No. 1106, Legislative Decree to effectively fight against money laundering and other crimes related to illegal mining and organized crime).
- Financing of terrorism (Art. 4-A of Law Decree No. 25475, Law Decree that establishes the penalty for terrorism offenses and the procedures for investigation, investigation and trial).
- Corruption in the private sphere (Art. 241-A of the Criminal Code).
- Corruption within private entities (Art. 241-B of the Criminal Code).

The development of this Compliance Policy, as well as the measures and the design of the Compliance Management System that are deployed from it, have taken into consideration our context as an organization as well as the requirements established by the **ISO 37001:2016** standard, current laws and regulations on compliance and crime prevention that apply to **BMSP** in the development of its activities, having deployed the necessary resources for its proper application and effectiveness which is subject to reviews and permanent monitoring in order to apply the necessary improvement measures in each moment and be able to adapt to the possible changes of context to achieve the following main objectives:

- Eliminate, reduce and/or manage exposure to the risks of crime in our activities.
- Prevent actions or behaviors that violate current legislation or are perceived by our stakeholders as ethically unacceptable.
- Train and sensitize members, business partners and the like of **BMSP** on the risks of the crimes to which their actions are exposed, as well as the adequate response mechanisms established by our organization.

Reach, scope and objectives

This Compliance Policy is applicable to all **BMSP** processes.

We identify and periodically evaluate the risks of the crimes to which our activities are exposed, documenting the results in our **Risk identification and assessment matrix** and we establish **Control plans** for the risks evaluated above "low risk" with the clear objective of preventing and reducing their probability of occurrence, as well as to establish monitoring and control mechanisms.

Any member of **BMSP**, director, representative and/or person acting in an authorized manner on behalf of **BMSP**, has the obligation to communicate and/or report any action, conduct, information or evidence that is susceptible or suspected of violating the policy of compliance of **BMSP** and may suppose an act or criminal conduct and for this purpose we have arranged BRIDGELINE as a means for any person to report any type of suspicious act or conduct, through:

- By telephone: [0-800-50-000](tel:0-800-50-000)
- Web Site: <https://www.bridgestone.com/responsibilities/bridgeline/>

And any type of doubt or query can be raised through: LiManuel@bridgestone.com.pe

BMSP appreciates and positively values the communication of any indication or suspicion of violation of legality by any member, person or organization linked to our organization, for which we appreciate as much detail as possible in the exposition of the reported / reported facts.

BMSP has provided safe internal mechanisms and processes to guarantee the confidentiality of the complaints and communications received, as well as to protect from any type of threat or coercion those people who participate with our objective of compliance through communication and reporting.

For the maximum guarantee of independence, **BMSP** has designated a specific position within its organizational structure, called the **Compliance Officer**, a position endowed with adequate capacity, independence and authority, directly depending on the **Board of Directors** and with direct reporting capacity to the **Representative of the Board of BMSP**, which will ensure the correct implementation, monitoring and improvement of the **Compliance Management System**, according to the defined and agreed requirements. The appointed **Compliance Officer** is available to all members of **BMSP** to advise, guide and support them in matters of ethical performance and compliance. Likewise, **BMSP** will have all the necessary resources, in a proportionate manner, to carry out the actions, measures and controls planned in our Risk Control Plan.

BMSP has a **CODE OF CONDUCT** that is current and approved by the General Management of **BMSP**, applicable to all contracted personnel who are informed of their incorporation into the company. Said **CODE OF CONDUCT** will be applied to any member of **BMSP**, without prejudice to the legal consequences that could fall on it for those acts, acts or behaviors that involve a violation of legality.



Takashi Yamawaki
Representative of the Board of BMSP

Lima, June 2nd, 2023