Social Performance and Community Engagement Policy

Group policy

xstreco

Contents

Approved by	The Board of Directors of Xstreco AG
Issued by	Executive management
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Version	2.1

1 Introduction

1.1 Purpose and Scope

1.1.1 Purpose of the Policy

This policy sets out the requirements that apply to the social performance of the Group and to its engagement with the communities affected by its activities. It covers stakeholder identification and engagement, social risk and impact assessment, grievance handling, local employment and procurement, and community investment.

1.1.2 Scope and Applicability

This policy applies to all employees, directors, officers, and contractors under Xstreco's direct supervision, working for any Xstreco office or industrial asset directly or indirectly controlled or operated by Xstreco worldwide. Where the Group holds an interest in a joint venture that it does not control or operate, it uses its influence to encourage conduct consistent with this policy.

2 Policy Statement

2.1 Group’s Stance on Social Performance and Community Engagement

Engagement with the communities affected by an activity of the Group is required, and must respect their rights, cultures and institutions and those of Indigenous Peoples. Where an activity may affect Indigenous Peoples, the prior consultation process required by the applicable law applies, the Group supports that process and participates in it as required, and, independently of that process, the Group’s own engagement must be directed at Free, Prior and Informed Consent. This policy requires contribution to local development through local employment, local procurement and community investment. Engagement must be conducted so as to seek the trust of the communities affected by the Group’s activities.

2.2 Legal Implications

In Peru, the Reglamento de Participación Ciudadana en el Subsector Minero, approved by Decreto Supremo N.° 028-2008-EM, governs the information given to, and the consultation of, the population in the area of influence of a mining activity, and Ley N.° 29785 with its reglamento Decreto Supremo N.° 001-2012-MC governs prior consultation of Indigenous or original peoples. In Switzerland, Articles 964j to 964l of the Code of Obligations and the associated ordinance impose on companies within their scope due diligence and reporting duties in respect of minerals from conflict-affected areas and of child labour; the Group applies them where it falls within that scope. The instruments listed under International Standards and Frameworks in section 9.2 are standards and frameworks rather than binding law; they bind the Group only where a contract or a financing agreement so requires. Non-compliance with this policy, and the conduct it prohibits, may result in reputational damage, legal penalties, and internal disciplinary action.

3 Key Principles and Guidelines

3.1 Specific Principles or Guidelines

This policy requires the following principles to be applied:

(a) Stakeholder Mapping and Engagement: Stakeholders must be identified and engaged throughout the project lifecycle, including groups vulnerable to the effects of an activity.

(b) Social Risk and Impact Assessments: Social risks and impacts must be assessed and managed, including those relating to resettlement, cultural heritage and livelihoods.

(c) Grievance Mechanisms and Resolution: Grievance mechanisms must be accessible, transparent and compatible with the effectiveness criteria in the UN Guiding Principles.

(d) Local Content and Procurement: Where the requirements of the role or of the contract are met and the applicable law permits, preference must be given to local hiring and local procurement, applied consistently with the Equality, Diversity and Inclusion (EDI) Policy.

(e) Community Investment and Development: Community investment must be directed to priorities identified with the community concerned, and must be recorded.

3.2 Examples and Applications

(a) Stakeholder Consultation: A new project is planned near a rural community. Early engagement is required so that concerns are understood and taken into account in the project design.

(b) Community Grievance Resolution: A community member reports dust emissions from a nearby site. The report must be assessed and, where it requires investigation, investigated; where the cause is established, the emissions must be mitigated and the outcome communicated.

(c) Local Hiring Initiatives: Recruitment is under way for a new facility. Preference must be given to candidates from the surrounding communities who meet the requirements of the role, where the applicable law permits and consistently with the Equality, Diversity and Inclusion (EDI) Policy, and those recruited must be given the training the role requires.

(d) Cultural Heritage Protection: A construction site is near a culturally significant area. Consultation with the representative institutions of the community is required, and the plans are adjusted so far as practicable to avoid disturbance and, where it cannot be avoided, to minimise and mitigate it.

(e) Resettlement Planning: A project requires land acquisition. Performance Standard 5 of the IFC Performance Standards is applied as the reference standard, and the affected households must be able to take part in the process and must be compensated.

4 Roles and Responsibilities

4.1 The Board

Oversight of this policy rests with the board. The board approves this policy and each revision of it.

4.2 Executive Management

Executive management issues this policy, provides the means required to apply it, and is accountable to the board for its application. Where this policy requires a matter to be escalated, it is escalated to executive management.

4.3 Responsibility for This Policy

Responsibility for the day-to-day application of this policy is assigned within the Group. This policy requires that the assignment be recorded in the Schedule of Policy Assignments, an internal document, be kept current, and be made known to those subject to this policy. Where this policy refers to the compliance function, it means the person or persons holding that assignment at the relevant time, whether or not a separate department exists.

4.4 Those Who Direct the Work of Others

Anyone who directs the work of others is responsible for applying this policy in the work they direct, for making those they direct aware of it, and for passing on a concern raised with them.

4.5 Everyone Subject to This Policy

Everyone subject to this policy must comply with it, must raise a concern where they believe it has been or may be breached, and must co-operate with any enquiry into such a concern.

4.6 Counterparties

Counterparties must meet the standards in this policy where their contract with the Group so provides, and may raise a concern through the channels in section 5.1.

4.7 Those Responsible for Community Relations

Those responsible for relations with a community affected by the Group’s activities are responsible for the engagement this policy requires, for the routes by which members of that community may raise a concern, and for recording what was raised and how it was addressed.

5 Reporting and Monitoring

5.1 Reporting Mechanisms

5.1.1 Internal Reporting

A concern under this policy may be raised with a line manager, with any member of executive management, or with the compliance function. A concern may also be raised through the web reporting form at xstreco.com/report, by writing to compliance@xstreco.com or codeofconduct@xstreco.com, both of which reach the compliance function, or by telephone on +41 41 562 32 90, asking for the compliance function. Retaliation against a person who raises a concern in good faith is prohibited.

5.1.2 External Reporting

A person who is not employed by the Group may raise a concern through the web reporting form at xstreco.com/report, by writing to compliance@xstreco.com or codeofconduct@xstreco.com, by telephone on +41 41 562 32 90, or by post, marked 'Confidential - Compliance', to the address at the end of this document. A concern may be raised in English or in Spanish. A name and contact details are not required, and a concern raised without them is assessed in the same way. The Group's website provider records basic technical data with every submission, so a report made through the form is not technically anonymous, and a call is not anonymous; a report sent by post can be.

5.2 Monitoring Procedures

This policy requires that its application be kept under review, and that a record sufficient to show how it has been applied be kept. In particular, this policy requires:

(a) that compliance with this policy be reviewed on the cycle stated in section 8;

(b) that concerns raised under this policy, and the way in which each was resolved, be recorded;

(c) that the risk this policy addresses be reassessed whenever the Group's activities change materially;

(d) that matters which are unresolved, which recur, or which are systemic be escalated to executive management and, where the law requires it or it is otherwise appropriate, to the competent authorities;

(e) that those subject to this policy be able to demonstrate, from the records kept, that its requirements were met.

The means used to meet these requirements are proportionate to the size of the Group and to the scale and nature of its activities at the time, and are extended as those change.

6 Training and Awareness

6.1 Awareness on Appointment

This policy requires that everyone subject to it be made aware of it on appointment and be given the instruction needed to apply it in their role. The form and the depth of that instruction are proportionate to the role.

6.2 Continuing Awareness

This policy requires that awareness of it be refreshed on the cycle stated in section 8, and whenever the policy is revised or an event makes it necessary, and that those in roles carrying greater exposure to the risk this policy addresses receive instruction appropriate to that exposure.

7 Compliance and Consequences

7.1 Reporting Non-Compliance

Everyone subject to this policy must report suspected violations, as must counterparties where their contract with the Group so provides. The identity of the person making a report is treated as confidential and is not disclosed except where disclosure is required by law or is necessary for the enquiry, and then only to the extent necessary. Retaliation against a person who reports in good faith is prohibited.

7.2 Consequences of Non-Compliance

Violations may result in disciplinary action, including termination of employment or contract, and may trigger legal proceedings.

8 Review and Revision

8.1 Review Frequency

8.1.1 Review Cycle

This policy is reviewed at least once in every two calendar years.

8.1.2 Event-Triggered Review

A review is carried out, whether or not one is due under the cycle, whenever a change in the law, a material change in the Group's activities, or an event arising under this policy makes one necessary.

8.1.3 Conduct and Outcome of the Review

The review is carried out by the holder of the responsibility described in section 4.3. Its outcome is submitted to the board, and any revision resulting from it is approved by the board before issue.

8.2 Revision History

8.2.1 Version 2.1 - 01.09.2026

Approved by the board and issued by executive management following a scheduled review of the suite. The amendments are editorial and clarifying; the policy positions stated in version 2.0 are unchanged.

8.2.2 Version 2.0 - 01.01.2026

Approved by the board and issued by executive management, replacing the first issue.

8.2.3 Version 1.0 - 02.06.2025

First issue.

8.2.4 Superseded Versions

Superseded versions are retained. Each revision is communicated to those subject to this policy.

9 Appendices

9.1 Glossary of Terms

(a) Stakeholder: Any individual or group affected by or with an interest in Xstreco’s operations.

(b) Social Risk and Impact Assessment: Evaluation of the social and economic effects of an activity on communities.

(c) FPIC (Free, Prior and Informed Consent): The principle that the consent of Indigenous Peoples is sought for an activity affecting their lands, resources or rights, and that it is for them to give or withhold it, freely and on the basis of full prior information. Where the applicable law provides for prior consultation rather than consent, that law governs and engagement is directed at consent.

(d) Grievance Mechanism: A process for receiving, assessing, addressing and responding to complaints or concerns raised by stakeholders.

(e) Local Content: The use of local labour, materials and services in an operation.

9.2 Related Legislation

9.2.1 Local Legislation

In Peru, the Reglamento de Participación Ciudadana en el Subsector Minero, approved by Decreto Supremo N.° 028-2008-EM, and Ley N.° 29785 on prior consultation of Indigenous or original peoples with its reglamento Decreto Supremo N.° 001-2012-MC. In Switzerland, Articles 964j to 964l of the Code of Obligations and the Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour (SR 221.433).

9.2.2 International Standards and Frameworks

(a) UN Sustainable Development Goals: The seventeen goals adopted by the UN General Assembly in 2015.

(b) IFC Performance Standards: Requirements the IFC applies to the projects it finances. The edition in force at the time an activity is assessed is the reference used in this policy.

(c) UN Guiding Principles on Business and Human Rights: Endorsed by the UN Human Rights Council in 2011, giving effect to the Protect, Respect and Remedy Framework of 2008. The effectiveness criteria for non-judicial grievance mechanisms are set out in Principle 31. Not a treaty.

(d) OECD Guidelines for Multinational Enterprises on Responsible Business Conduct: Recommendations to enterprises. Not binding law.

> “Xstreco’s policies set the standards that govern how the Group conducts its activities and how that conduct is assessed.”

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