Human Rights and Indigenous Rights 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 respect for human rights and for the rights of Indigenous Peoples in the operations and supply chain of the Group. It covers due diligence, engagement with affected communities, grievance handling and remedy.

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 Human Rights and Indigenous Rights

Forced labour, child labour, human trafficking, discrimination and harassment are prohibited, as is any other conduct that abuses human rights. Where an activity may affect the lands, resources or cultural heritage of Indigenous Peoples, a process directed at Free, Prior and Informed Consent (FPIC) is required, conducted in accordance with the applicable law. Retaliation against a person who raises a human rights concern, including a human rights defender, is prohibited. Where the Group has caused or contributed to an adverse human rights impact, it is required to provide for or co-operate in remediation.

2.2 Legal Implications

In Switzerland, Articles 964j to 964l of the Code of Obligations impose on companies within their scope due diligence and reporting duties in respect of minerals and metals from conflict-affected and high-risk areas and of products and services in relation to which child labour is suspected, and the associated ordinance (SR 221.433) sets their scope, thresholds and exemptions; the Group applies them where it falls within that scope. In Peru, prior consultation of Indigenous or original peoples is governed by Ley N.° 29785 and its reglamento Decreto Supremo N.° 001-2012-MC, which give effect to ILO Convention No. 169, ratified by Peru. The other 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) Human Rights Due Diligence: Human rights risk across the operations and supply chain of the Group must be identified, assessed, mitigated and documented.

(b) Indigenous Rights and Consultation: Where a project or a significant change may affect Indigenous or original peoples, the prior consultation process required by the applicable law applies, and the Group supports that process and participates in it as required. Independently of that process, the Group's own engagement is directed at Free, Prior and Informed Consent, and is conducted and recorded on that basis.

(c) Non-Discrimination and Inclusion: Treating a person less favourably on a ground prohibited by the Equality, Diversity and Inclusion (EDI) Policy or by the applicable law is prohibited, and the position of vulnerable groups must be taken into account when impact is assessed.

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

(e) Responsible Sourcing: Suppliers and business partners must meet the human rights standards set out in the Supplier Code of Conduct and conduct due diligence on their own operations and supply chains, on a risk basis, where their contract so provides.

(f) Security and Human Rights: Where security is provided for an activity of the Group, whether by the Group or by a third party, this policy requires that the Voluntary Principles on Security and Human Rights be applied as a reference in arranging it and that the persons providing security be made aware of this policy.

3.2 Examples and Applications

(a) Respecting Land Rights: A project is proposed near Indigenous territory. Where the applicable law requires prior consultation, the Group supports the process conducted by the competent authority, conducts its own engagement directed at Free, Prior and Informed Consent, and adjusts its plans in the light of what those processes establish.

(b) Responding to a Forced Labour Allegation: Information indicates that a supplier may be using forced labour. The matter must be assessed without delay, the relationship suspended where the information warrants it, and, where the violation is established, remediation obtained before the relationship resumes.

(c) Engaging in FPIC Processes: A new project is planned at one of the Group's concessions. Early engagement with the representative institutions of the Indigenous Peoples concerned is required, and the process and its outcome must be documented.

(d) Supporting Human Rights Defenders: A non-governmental organisation or a human rights defender raises concerns about community impacts. The concerns must be considered on their merits, and retaliation is prohibited.

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) Human Rights Due Diligence: Identifying, preventing, mitigating and accounting for an enterprise’s impacts on human rights.

(b) 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.

(c) Vulnerable Groups: Individuals or communities at higher risk of human rights abuses due to socio-economic status, ethnicity, gender, or other factors.

(d) Non-Discrimination: Not treating a person less favourably on a ground prohibited by the Equality, Diversity and Inclusion (EDI) Policy or by the applicable law.

(e) Remediation: Actions taken to correct or compensate for adverse human rights impacts.

(f) Human Rights Defenders: Individuals or groups who promote and protect human rights and may be at risk.

9.2 Related Legislation

9.2.1 Local Legislation

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). In Peru, Ley N.° 29785, Ley del Derecho a la Consulta Previa a los Pueblos Indígenas u Originarios, and its reglamento Decreto Supremo N.° 001-2012-MC.

9.2.2 International Standards and Frameworks

(a) Universal Declaration of Human Rights: Adopted by the UN General Assembly in 1948. The foundational international statement of human rights. Not a treaty.

(b) 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.

(c) ILO Convention No. 169: The Indigenous and Tribal Peoples Convention, 1989. Ratified by Peru and binding on Peru; given effect there by Ley N.° 29785 and Decreto Supremo N.° 001-2012-MC.

(d) UN Declaration on the Rights of Indigenous Peoples: Adopted by the UN General Assembly in 2007. Not a treaty.

(e) Voluntary Principles on Security and Human Rights: Guidance on how the security of operations can be provided consistently with respect for human rights. Not a treaty. Section 3.1 requires that they be applied as a reference where security is provided for an activity of the Group.

(f) OECD Guidelines for Multinational Enterprises on Responsible Business Conduct: Recommendations to enterprises.

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

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