Health, Safety and Emergency Management 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 health and safety of employees, contractors and visitors at the offices and industrial assets of the Group, and to the management of emergencies. It covers hazard identification and risk assessment, emergency preparedness and response, health surveillance, incident investigation and the safety management of contractors.

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 Health, Safety and Emergency Management

The health and safety of the workforce, of the communities around an operation and of others who may be affected by an activity of the Group must be protected. Work must not proceed where a hazard has not been assessed and controlled. Anyone performing work for the Group has the authority to stop a task they consider unsafe, and may not be disadvantaged for exercising it. For hazards capable of causing a fatality, the controls on which prevention depends must be identified, in place and verified before the work proceeds. Psychological safety and mental health fall within the scope of this policy, and no person may be assigned to a task when they are not fit for work. Emergency, incident and crisis management arrangements are required at each site.

2.2 Legal Implications

In Switzerland, the Federal Act on Accident Insurance (UVG/LAA, SR 832.20) and the Ordinance on the Prevention of Accidents and Occupational Diseases (VUV/OPA, SR 832.30) require the employer to take the measures necessary to prevent occupational accidents and occupational diseases, and the Labour Act (ArG/LTr, SR 822.11) with its ordinances governs health protection at work. In Peru, Ley N.° 29783, Ley de Seguridad y Salud en el Trabajo, and the Reglamento de Seguridad y Salud Ocupacional en Minería, approved by Decreto Supremo N.° 024-2016-EM, as amended, apply to the mining assets. The instruments listed under International Standards and Frameworks in section 9.2, other than the ILO Conventions, are standards and frameworks rather than binding law; they bind the Group only where a contract or a financing agreement so requires. ILO Convention No. 155 is a treaty binding on the States that ratify it; neither Switzerland nor Peru has ratified it, and it is referred to in this policy as a benchmark only. ILO Convention No. 176 on safety and health in mines has been ratified by Peru and takes effect for the Group’s Peruvian assets through the Peruvian law cited above. 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) Hazard Identification and Risk Assessment: Physical and psychological hazards must be identified and assessed before work begins, and the controls required, including personal protective equipment, determined.

(b) Emergency Preparedness and Crisis Response: A site-specific emergency response plan is required at each site, and drills must be conducted on a defined cycle.

(c) Health Surveillance and Wellness: Health surveillance appropriate to the exposures of the role is required, and mental well-being must be supported.

(d) Incident Investigation and Corrective Action: Incidents and near misses must be reported and investigated to identify root causes, and corrective actions must be recorded and closed out.

(e) Contractor Safety Management: Contractors must meet the standards in this policy and be included in the safety arrangements of the site.

3.2 Examples and Applications

(a) Workplace Injury Response: An employee sustains a minor injury. First aid must be administered by a person trained to give it, the incident must be reported, and it must be investigated to identify its root cause, the investigation and its outcome being recorded.

(b) Emergency Evacuation: A fire alarm triggers an evacuation. Employees must follow the evacuation protocol for the site and assemble at the muster points designated in it.

(c) Fire Drill Protocol: A drill falls due at a site. It must be conducted on the cycle defined for that site, personnel must take part so that they are familiar with the emergency exits and procedures, and the drill must be recorded.

(d) Fatigue Management: A contractor reports fatigue before a shift. The supervisor must adjust the schedule and provide for adequate rest.

(e) Chemical Spill Response: A chemical spill is identified. The emergency response plan must be activated and the area secured and cleaned.

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 Work on Site

Those responsible for work on a site, whether carried out by employees or by contractors, are responsible for identifying the hazards that work presents, for applying the controls this policy requires before the work begins, and for the emergency arrangements that apply while it is under way.

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) Hazard: A potential source of harm or adverse health effect.

(b) Near Miss: An unplanned event that did not result in injury but had the potential to do so.

(c) PPE (Personal Protective Equipment): Equipment worn to minimise exposure to hazards.

(d) Emergency Response Plan: A documented plan outlining actions to take during emergencies.

(e) Risk Assessment: The process of evaluating risks to health and safety from workplace hazards.

(f) Evacuation Protocol: Procedures to follow in the event of an emergency requiring evacuation.

(g) Fit for Work: The condition of a person who is physically and mentally capable of performing their duties safely.

9.2 Related Legislation

9.2.1 Local Legislation

In Switzerland, the Federal Act on Accident Insurance (SR 832.20), the Ordinance on the Prevention of Accidents and Occupational Diseases (SR 832.30) and the Labour Act (SR 822.11) with its ordinances. In Peru, Ley N.° 29783, Ley de Seguridad y Salud en el Trabajo, and the Reglamento de Seguridad y Salud Ocupacional en Minería, Decreto Supremo N.° 024-2016-EM, as amended.

9.2.2 International Standards and Frameworks

(a) ISO 45001:2018, with Amendment 1:2024 on climate action changes: Requirements for an occupational health and safety management system.

(b) ILO Convention No. 155, the Occupational Safety and Health Convention, 1981: One of the ten ILO fundamental Conventions since June 2022. It binds the States that ratify it; neither Switzerland nor Peru has ratified it.

(c) ILO Convention No. 176, the Safety and Health in Mines Convention, 1995: Ratified by Peru and binding on Peru; given effect there by Ley N.° 29783 and Decreto Supremo N.° 024-2016-EM, as amended.

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

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

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