Environmental Sustainability Policy

Group policy

xstreco

Contents

Approved by	The Board of Directors of Xstreco AG
Issued by	Executive management
Issued on	01.09.2026
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 management of the environmental effects of the Group's activities and to the application of sustainable practices across the Group. It sets the standards against which environmental performance is assessed.

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 Environmental Sustainability

This policy requires that the environmental effects of the Group's activities be identified, assessed and managed. Where an activity affects habitats or species, the mitigation hierarchy in section 3.1 applies. Exploration and mining must not be undertaken in World Heritage properties, and an activity affecting a legally designated protected area may be undertaken only where the law permits it and the required authorisations have been obtained. This policy requires that greenhouse gas emissions be measured and managed, that natural resources be managed responsibly, and that environmental considerations be taken into account in decision-making and in the planning of the Group's activities.

2.2 Legal Implications

The Group's activities in Peru are subject to Ley N.° 28611, Ley General del Ambiente, to Ley N.° 27446, Ley del Sistema Nacional de Evaluación del Impacto Ambiental, and, for exploration activities, to Decreto Supremo N.° 042-2017-EM, as amended; Decreto Supremo N.° 040-2014-EM, as amended, applies to mining exploitation, beneficiation, general labour, transport and storage. Activities carried on in Switzerland are subject to the Environmental Protection Act (SR 814.01) and the Waters Protection Act (SR 814.20). This policy is further structured against the Swiss regime for reporting on non-financial and climate matters, being Articles 964a to 964c of the Swiss Code of Obligations and the Ordinance on Climate Disclosures, which apply to companies of public interest established in Switzerland that meet the thresholds those provisions define; the Group is not within their scope at the date of this issue and applies them voluntarily as reporting references, as the Climate Action Transition Plan states. It is also structured against ISO 14001 Environmental management systems, IFRS S2 Climate-related Disclosures and the UN Sustainable Development Goals, which are standards and frameworks rather than binding law. 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) Climate Change Mitigation and Adaptation: Greenhouse gas emissions arising from the Group's activities must be measured and managed using the Greenhouse Gas Protocol, and resilience to climate-related risks must be assessed. The scope of measurement is proportionate to the activities carried on at the time. The Group's approach to climate transition is set out in the Climate Action Transition Plan.

(b) Biodiversity and Ecosystem Protection: Where an activity affects habitats or species, the effect must be assessed and avoidance, minimisation, restoration and offset measures (the mitigation hierarchy) must be applied in that order.

(c) Water Stewardship: Water must be managed responsibly, and abstraction, use and discharge must be recorded where an activity involves them.

(d) Waste and Emissions Management: Waste must be reduced, materials must be recovered and reused where practicable, and emissions to air, water and soil must be controlled.

(e) Sustainable Procurement: Suppliers must be engaged against the standards in the Responsible Sourcing and Supply Chain Policy and the Supplier Code of Conduct.

(f) Environmental Risk Management: Environmental risks must be assessed, mitigated and recorded in the risk register required by the Enterprise Risk Management Policy.

3.2 Examples and Applications

(a) Energy Consumption: Equipment at a site is to be installed or replaced. Energy-efficient technologies and practices must be specified for it.

(b) Hazardous Waste: Hazardous waste arises at a site. Its disposal and treatment must be arranged through authorised contractors and must be recorded, so as to reduce the risk of contamination.

(c) Water Conservation: A water system is to be installed or modified. Water-saving fixtures and recycling systems must be specified for it.

(d) Biodiversity Protection: An activity is planned that may affect a habitat or a species. The mitigation hierarchy in section 3.1 must be applied, and offset measures must be used only where avoidance, minimisation and restoration cannot address the effect.

(e) Renewable Energy: Energy is to be procured for a facility. Renewable supply options must be assessed as part of that decision, to reduce Scope 2 emissions and improve energy resilience.

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 Site and Environmental Matters

Those responsible for a site, or for an activity with an environmental effect, are responsible for identifying that effect, for applying the controls this policy requires, and for keeping the records from which compliance can be shown.

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) Emissions: The release of pollutants into the environment, typically from industrial or energy-related activities.

(b) Biodiversity: The variety of life in all its forms, including species, ecosystems and genetic diversity.

(c) Water Stewardship: The responsible planning and management of water resources.

(d) Scope 1, 2 and 3 Emissions: Categories of greenhouse gas emissions defined by the Greenhouse Gas Protocol according to their source (direct emissions, indirect emissions from purchased energy, and other value chain emissions).

9.2 Related Legislation

9.2.1 Local Legislation

In Switzerland, Articles 964a to 964c of the Code of Obligations, the Ordinance on Climate Disclosures (SR 221.434), the Environmental Protection Act (SR 814.01) and the Waters Protection Act (SR 814.20). In Peru, Ley N.° 28611 (Ley General del Ambiente), Ley N.° 27446 (Ley del Sistema Nacional de Evaluación del Impacto Ambiental), Decreto Supremo N.° 042-2017-EM (Reglamento de Protección Ambiental para las Actividades de Exploración Minera), as amended, which applies to exploration activities, and Decreto Supremo N.° 040-2014-EM (Reglamento de Protección y Gestión Ambiental para las Actividades de Explotación, Beneficio, Labor General, Transporte y Almacenamiento Minero), as amended.

9.2.2 International Standards and Frameworks

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

(b) UNESCO World Heritage Convention: The treaty under which World Heritage properties are designated. It binds the States that have ratified it and takes effect for the Group through their national law.

(c) ISO 14001:2026: The international standard for environmental management systems, which supersedes the 2015 edition. It is certifiable; this policy does not require certification to it.

(d) IFRS S2 Climate-related Disclosures: The global baseline for climate-related financial disclosure, which incorporates the TCFD recommendations.

(e) Greenhouse Gas Protocol: The framework for greenhouse gas emissions accounting and reporting. Section 3.1 requires that greenhouse gas emissions arising from the Group's activities be measured and managed using it.

> "Xstreco's policies set the standards that govern how the Group conducts its activities and how that conduct is assessed."

Xstreco AG
General-Guisan-Strasse 6
CH-6300 Zug
Switzerland

Email info@xstreco.com
Web xstreco.com