Modern Slavery Statement

Preventing forced labour, child labour and human trafficking

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 of the Statement

This statement is published voluntarily by Xstreco AG. It sets out the arrangements by which the Group identifies, prevents and addresses the risk of modern slavery, forced labour, human trafficking and child labour in its operations and supply chains.

It describes the standards the Group applies and the processes by which those standards are implemented, monitored and reviewed.

Group requirements provide for human rights due diligence to be applied to the Group's operations and supply chains as a standing requirement, whatever the scale of activity.

The statement is structured against the reporting areas set out in the UK Home Office statutory guidance Transparency in Supply Chains, issued under section 54 of the Modern Slavery Act 2015, which imposes no obligation on the Group at the date of this statement but provides a recognised structure for reporting on modern slavery risk:

1. Organisational structure and supply chains
2. Policies in relation to slavery and human trafficking
3. Due diligence processes
4. Risk assessment and management
5. Key performance indicators to measure effectiveness
6. Training on modern slavery and trafficking

1.2 Legal and Regulatory Context

The Group's approach is structured against the following legal and regulatory references:

- The Swiss Criminal Code provisions on human trafficking and on corporate liability
- The Swiss Code of Obligations, Articles 964j to 964l, which 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 Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour, which sets their scope, thresholds and exemptions; the Group applies them where it falls within that scope
- Peruvian legislation governing trafficking and forced labour, labour rights, occupational safety and health, mining safety and the prior consultation of Indigenous Peoples, as listed in Appendix D
- International standards including the UN Guiding Principles on Business and Human Rights, the ILO fundamental Conventions, the OECD Due Diligence Guidance for Responsible Business Conduct and the UN Sustainable Development Goals; the ILO Conventions bind the States that have ratified them and take effect for the Group through national law, and the other instruments are standards and frameworks rather than binding law; those other instruments bind the Group only where a contract or a financing agreement so requires

1.3 Scope of the Statement

This statement applies to the Group, being:

- Xstreco AG, the parent company, established in Zug, Switzerland
- The Peruvian subsidiaries through which the Group holds its mining concessions and carries out its activities in Peru
- Any other entity controlled by Xstreco AG

It covers the Group's activities, including corporate governance, permitting, supplier engagement and the integration of human rights due diligence across its Swiss and Peruvian operations. 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 statement.

1.4 Approval and Review

This statement is approved by the Board of Directors of Xstreco AG, reviewed at least annually, and in addition whenever a change in the law, a material change in the Group's activities or an event arising under this statement makes a review necessary, and reissued where a review results in a change. Changes are recorded and reflected in the next issue.

2 Our Commitment

2.1 Ethical Principles and Values

Xstreco's requirements are directed at respecting the dignity, rights and freedoms of the individuals affected by its operations and supply chains. Modern slavery, including forced labour, human trafficking, debt bondage and the worst forms of child labour, is a severe violation of human rights and requires sustained action.

Ethical conduct and respect for human rights are fundamental to the Group's conduct of business. Modern slavery has no place in the Group's business or supply chains, and Group requirements provide for that principle to be applied in governance, procurement and operations.

2.2 Alignment with International Standards

Xstreco's approach to modern slavery is guided by internationally recognised frameworks, including:

- The UN Guiding Principles on Business and Human Rights (UNGPs)
- The ILO fundamental Conventions, in particular those on forced labour, child labour and freedom of association
- The OECD Due Diligence Guidance for Responsible Business Conduct
- The UN Sustainable Development Goals (SDGs), especially target 8.7 (eradicate forced labour, end modern slavery and human trafficking)

Group requirements provide for these frameworks to inform the Group's policies, risk assessment and due diligence processes and to be reflected in its internal controls and supplier requirements.

2.3 Voluntary Transparency and Continuous Improvement

This statement is published voluntarily. Transparency is treated as a condition of responsible business, and the arrangements it describes apply to the Group's operations and supply chains as a standing requirement.

This statement is reviewed and reissued on the cycle set out in section 1.4.

Continuous improvement requires:

- Expanding supply chain mapping and risk assessment
- Strengthening due diligence and remediation processes
- Enhancing training and awareness for staff and suppliers
- Engaging with stakeholders, including non-governmental organisations, trade unions and affected communities

Identifying and addressing modern slavery risk requires continuing attention. Group requirements provide for engagement with stakeholders, including the communities affected by the Group's activities, and for their views to be taken into account.

3 Governance and Oversight

3.1 Board and Executive Responsibility

The Board of Directors holds ultimate responsibility for the Group's approach to modern slavery and human rights due diligence. The board reviews and approves this statement at least annually.

Operational oversight is delegated to the holder of the compliance function, who reports to the board and is responsible for:

- Maintaining alignment with the Swiss and Peruvian legal requirements applicable to the Group
- Overseeing the implementation of anti-slavery policies and procedures
- Coordinating risk assessments and due diligence activities
- Monitoring performance and reporting progress

The holder of the compliance function is supported by those responsible for legal matters, for procurement and for community relations, whether as separate functions or as responsibilities held by the same persons. Where this statement refers to the compliance function, it means the person or persons to whom responsibility for the day-to-day application of this statement is assigned within the Group under the Schedule of Policy Assignments, an internal document, at the relevant time, whether or not a separate department exists.

3.2 Policy Framework and Internal Controls

The Group maintains a policy framework covering human rights and anti-slavery principles. Its principal instruments include:

- The Human Rights and Indigenous Rights Policy, structured against the UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights and ILO Convention No. 169
- The Supplier Code of Conduct, which prohibits forced, bonded and indentured labour, child labour, the retention of workers' identity documents or deposits and the charging of recruitment fees to workers
- The Whistleblowing and Ethics Reporting Policy, which provides confidential channels through which a concern of any kind, including a concern about modern slavery, may be raised

These policies are reviewed at least once in every two calendar years, and in addition whenever a change in the law, a material change in the Group's activities or an event arising under the policy concerned makes a review necessary. Group requirements provide for them to be applied through the Group's internal controls, including supplier onboarding, contract management and, where proportionate, assurance arrangements.

3.3 Stakeholder Engagement and Oversight

Stakeholder engagement in the governance approach is required to include:

- Engaging with non-governmental organisations, trade unions and civil society organisations to inform policy and risk assessment
- Consulting local communities and Indigenous groups in Peru to understand context-specific risk
- Participating, where proportionate to the Group's activities, in industry or multi-stakeholder initiatives on responsible sourcing and recruitment

Group requirements provide for governance of modern slavery risk to be shared across the organisation rather than held in a single function. This is required to include reporting to the board, instruction for those in senior roles, and defined accountability.

4 Organisation Structure and Supply Chains

4.1 Group Overview

Xstreco AG is a Swiss company established in Zug. At the date of this statement its activities are the exploration and evaluation of mineral assets in Peru, conducted through the entities described in section 1.3.

4.2 Supply Chain Structure

The Group's supply chain includes:

- Geological and environmental consulting services
- Drilling and exploration contractors
- Equipment and logistics providers
- Legal, financial and permitting advisers

- Local community engagement and social impact consultants
- Goods and services supplied to the Group's exploration and evaluation activities

Goods and services are sourced principally from Peru and Switzerland, with some services procured from elsewhere. Modern slavery risk can arise in labour-intensive services and subcontracted operations whatever the scale of procurement.

4.3 Labour Supply Chain

Xstreco's labour supply chain includes:

- Direct employees in Switzerland and Peru
- Contracted field workers and technical consultants
- Third-party service providers (e.g. consulting, security, catering, transport)

Recruitment practices across the Group's operations are required to be mapped, with attention to the use of labour brokers and subcontractors and to vulnerabilities among migrant and Indigenous workers.

4.4 Mapping and Transparency

Group requirements provide for the mapping of Tier 1 suppliers and, in proportion to the Group's activities at the time, of Tier 2 relationships. Tier 2 mapping is required to be prioritised in high-risk categories such as:

- Remote field operations
- Labour-intensive services
- Regions with known governance or enforcement gaps

Digital tools and third-party platforms may be used where they improve supply chain transparency and traceability proportionately to the scale of procurement.

4.5 Group Structure and Reporting Scope

This statement covers Xstreco AG and the other entities described in section 1.3.

4.6 Continuous Improvement

Group requirements provide for the following, applied in proportion to the scale and nature of the Group's activities at the time:

- Tier 2 mapping in high-risk categories maintained as the supplier base changes
- Engagement with suppliers to improve transparency and practice
- Collaboration with industry peers and non-governmental organisations to share data and improve leverage

5 Policies in Relation to Modern Slavery

5.1 Overview

The Group maintains a suite of corporate policies supporting the prevention of modern slavery, forced labour, human trafficking and child labour. Those policies apply across governance, risk management, procurement and operations and are structured against the UN Guiding Principles on Business and Human Rights, the ILO fundamental Conventions and the OECD Due Diligence Guidance.

5.2 Core Policies Supporting Anti-Slavery Objectives

5.2.1 Human Rights and Indigenous Rights Policy

- Requires respect for human rights and prohibits conduct that abuses them
- Prohibits all forms of modern slavery and child labour
- Recognises the rights of Indigenous Peoples and vulnerable communities in the areas where the Group operates

5.2.2 Responsible Sourcing and Supply Chain Policy

- Requires suppliers to be classified by risk on engagement, with due diligence proportionate to that classification, and provides for:
    - Enhanced due diligence where sourcing is from a conflict-affected or high-risk area
    - A corrective action plan where an assessment identifies a labour violation
    - Suspension or termination of the relationship where remediation fails
    - The Supplier Code of Conduct, incorporated into supplier contracts as that Code provides, which contains the prohibitions described in section 3.2; its rule that recruitment fees are borne by the employer is consistent with the Employer Pays Principle
    - Routes by which a supplier may raise a concern
- Application of the policy to the Group's own procurement, suppliers being bound through the Supplier Code of Conduct

5.2.3 Whistleblowing and Ethics Reporting Policy

- Provides confidential channels through which a concern of any kind, including a concern about modern slavery, may be raised. A name and contact details are not required, and a concern raised without them is assessed in the same way.
- Accessible to anyone, including employees, contractors and third-party workers.
- Includes protections against retaliation and escalation protocols.

5.2.4 Social Performance and Community Engagement Policy

- Requires inclusive stakeholder engagement and respect for community rights
- Requires grievance mechanisms and access to remedy for affected individuals

5.2.5 Enterprise Risk Management Policy

- Requires each risk to be entered in the risk register, assigned to an accountable owner and escalated according to its severity.
- Provides for oversight of the policy by the board, which sets and reviews the risk appetite within which risks are managed.

5.2.6 Equality, Diversity and Inclusion (EDI) Policy

- Requires non-discrimination and the fair treatment of all workers.
- Prohibits discrimination on grounds of trade union affiliation, political belief or any other characteristic protected by the applicable law.

5.3 Supporting Policies with Indirect Relevance

The Code of Conduct applies across the Group and lists this statement and the policies described above among the documents that support and complement it. While not directly focused on modern slavery, the following policies also support the Group's ethical and compliance culture:

- Anti-Corruption and Bribery Policy
- Anti-Money Laundering (AML) Policy
- Conflict of Interest Policy
- Fraud Policy
- Health, Safety and Emergency Management Policy
- Environmental Sustainability Policy
- Information Governance and Security Policy
- Corporate Communications Policy
- Political Engagement Policy
- Sanctions and Compliance Policy
- Tax Transparency Policy
- Competition Law Policy

These policies support the conduct of operations with integrity, transparency and accountability, which underpin effective modern slavery prevention.

5.4 Implementation and Communication

- All policies are approved by the board and reviewed on the cycle each policy states.
- Group requirements provide for key policies to be communicated to employees and suppliers on appointment or engagement, through instruction and through contractual obligations.
- Supplier contracts are required to contain clauses obliging compliance with the Supplier Code of Conduct.
- The policies are published at xstreco.com in English and Spanish.

5.5 Continuous Improvement

Group requirements provide for the following, applied in proportion to the scale and nature of the Group's activities at the time:

- Maintenance of the Spanish text of each policy in step with the English text
- A policy gap analysis against the OECD and UN Guiding Principles frameworks
- Supplier self-assessment tools to evaluate policy implementation
- Review of compliance with these policies where the risk is highest, recorded so that what was reviewed can be shown

6 Risk Assessment and Management

6.1 Overview

The risk assessment approach is designed to identify, prioritise and mitigate risks to workers, not only risks to the business.

The methodology is informed by the OECD Due Diligence Guidance (Steps 2-4) and the UN Guiding Principles on Business and Human Rights.

6.2 Risk Assessment Framework

6.2.1 Frequency and Governance

- This statement requires modern slavery risk to be entered in the risk register maintained under the Enterprise Risk Management Policy as a salient risk, to be reassessed at least annually and to be reported to the board.

6.2.2 Risk Identification Methodology

Risks are to be identified and assessed using:

- Recognised country and sector risk indices, which may include the Global Slavery Index and the United States Trafficking in Persons Report
- Internal procurement and supplier data
- Third-party assessments, where these are obtained
- Stakeholder engagement (e.g. NGOs, trade unions, Indigenous groups)

The assessment is also required to consider:

- Labour recruitment practices
- Use of subcontractors and brokers
- Migrant worker vulnerabilities
- Indigenous community dynamics in Peru

6.2.3 Priority Risk Areas

The following areas are treated as high priority:

- Peruvian field operations: Use of subcontracted labour in remote areas
- Labour supply chains: Potential use of informal recruitment channels
- Community-based services: Security, catering and logistics providers
- Exploration contractors: Short-term, high-risk engagements in rural zones

Mapping of Tier 1 suppliers in these categories is required, and the mapping and assessment of Tier 2 relationships in these categories is required in proportion to the Group's activities at the time.

6.3 Risk Mitigation Measures

To address identified risks, the following are required:

- Enhanced due diligence for high-risk suppliers (see section 7.2)
- Contractual clauses prohibiting forced labour and child labour
- Supplier self-assessment questionnaires and onboarding checks

- Community engagement protocols to identify local risks
- Integration of modern slavery risk into procurement decision-making

Early warning is to be drawn from grievance data, audit findings and supplier assessments.

6.4 Stakeholder Engagement

Engagement is required with:

- Local communities and Indigenous leaders in Peru
- NGOs and civil society organisations with expertise in labour rights
- Industry initiatives focused on responsible mining and ethical sourcing

This engagement is to inform risk prioritisation and support a victim-centred approach.

6.5 Continuous Improvement

Group requirements provide for the following, applied in proportion to the scale and nature of the Group’s activities at the time:

- Tier 2 suppliers in high-risk categories, once mapped, recorded in the risk register
- A modern slavery risk matrix tailored to the mining sector
- Testing of grievance and escalation procedures, where proportionate
- The risk assessment methodology documented for stakeholder review

7 Due Diligence Processes

7.1 Overview

The Group’s due diligence processes are designed to identify, prevent, mitigate and remediate actual and potential risks of modern slavery in its operations and supply chains, and are applied in proportion to the scale and nature of the Group’s activities at the time. They form part of the wider human rights due diligence framework and are structured against the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Due Diligence Guidance for Responsible Business Conduct.

The approach is risk-based, iterative and focused on outcomes for affected workers and communities.

7.2 Prevention and Mitigation Measures

The following due diligence measures are required:

- Supplier onboarding and screening: A risk-based assessment of every new supplier, covering labour practices, recruitment methods and grievance mechanisms.
- Contractual safeguards: Clauses in supplier contracts prohibiting forced labour, child labour and unethical recruitment, and requiring compliance with the Supplier Code of Conduct.
- Third-party assessments: Independent audit or assessment of high-risk suppliers, which may include worker interviews and site visits.
- Corrective action plans: Time-bound corrective actions agreed with the supplier where risks are identified, with progress monitored to closure.
- Responsible disengagement: A structured disengagement process where a supplier fails to remediate serious violations, giving priority to the welfare of affected workers.

7.3 Worker and Supplier Engagement

Meaningful engagement with workers and suppliers is a condition of effective due diligence.

The Group is required to:

- Engage with suppliers, by means proportionate to their risk classification, to raise awareness of modern slavery risk and of the Group's expectations
- Engage with Indigenous community leaders to understand local labour dynamics and vulnerabilities
- Seek the views of subcontracted workers directly, by means that do not require them to give a name
- Consult non-governmental organisations and trade unions on remediation protocols

7.4 Grievance Mechanisms and Access to Remedy

Xstreco requires grievance mechanisms that are accessible, confidential and culturally appropriate.

These include:

- The confidential channels provided for under the Whistleblowing and Ethics Reporting Policy, which are available to anyone, including employees, contractors and third-party workers, and through which a concern may be raised without giving a name.
- Community grievance mechanisms in Peru, which this statement requires to be designed by reference to the effectiveness criteria in the UN Guiding Principles, as the Social Performance and Community Engagement Policy also requires, and by reference to Performance Standard 1 of the IFC Performance Standards on Environmental and Social Sustainability, in the edition in force at the time.
- Escalation protocols for serious allegations, including referral to law enforcement or labour authorities where appropriate.

This statement requires that grievances be assessed promptly and, where they require investigation, investigated. Where the Group has caused or contributed to modern slavery, this statement requires it to provide for or co-operate in remediation, and where it is directly linked to modern slavery through a business relationship, to use its leverage to seek remedy. Remedy may include restitution, support services and protection from retaliation.

7.5 Remediation Framework

This statement requires the remediation process to be structured against the Modern Slavery Response and Remedy Framework published by the Minderoo Foundation (Walk Free) with the Human Rights Resources and Energy Collaborative, and to comprise:

- Identification and verification of harm
- Immediate protection and support for affected individuals
- Engagement with victims and stakeholders to determine appropriate remedy
- Implementation of remedy (e.g. restitution, compensation, safe repatriation)
- Monitoring of outcomes and satisfaction of survivors
- Systemic improvements to prevent recurrence

7.6 Continuous Improvement

Group requirements provide for the following, applied in proportion to the scale and nature of the Group's activities at the time:

- Extension of the supplier self-assessment programme to Tier 2 suppliers
- Integration of modern slavery indicators into the scope of internal assurance work
- A due diligence record covering supplier compliance, risk indicators, performance and outcomes
- Participation in initiatives on responsible recruitment as section 3.3 provides

8 Training on Modern Slavery and Human Rights

8.1 Overview

Group requirements provide for training directed at awareness, prevention and early identification of modern slavery risk, through a programme designed to enable employees, suppliers and community partners to identify, report and respond to potential exploitation.

The approach follows the OECD Due Diligence Guidance for Responsible Business Conduct, which recommends role-specific, risk-based and continuing training.

8.2 Internal Training Programme

8.2.1 Target Audiences and Coverage

The programme is required to cover:

- All employees: Mandatory induction module on human rights and modern slavery
- Procurement and supply chain staff: In-depth training on supplier due diligence, risk indicators and ethical sourcing
- Field operations and community teams: Training on identifying signs of exploitation in remote and Indigenous communities
- Executive management and the board: An annual briefing on modern slavery risk, governance and legal obligations

8.2.2 Content and Delivery

Training is to be delivered by means proportionate to the role and the risk, which may include:

- Workshops
- E-learning
- Case studies

Content is required to include:

- Definitions and forms of modern slavery
- Risk indicators and red flags
- Reporting procedures and escalation protocols
- Role-specific responsibilities and ethical decision-making

8.3 Supplier and Community Engagement

8.3.1 Supplier Training

Supplier engagement is required to cover:

- Awareness sessions on modern slavery and labour rights
- Distribution of the Supplier Code of Conduct and the Responsible Sourcing and Supply Chain Policy
- Guidance on grievance mechanisms and worker protections

8.3.2 Community Awareness

Where the Group's activities give rise to modern slavery risk in a community, community awareness is to be supported, where possible with local non-governmental organisations, covering:

- Workers' rights and protections
- How to report concerns safely
- Preventing child labour and exploitation in the labour supply chains that serve the Group's activities

8.4 Training Development and Evaluation

Training materials are to be developed with reference to recognised guidance and, where available, with the assistance of:

- Human rights specialists
- Non-governmental organisations and trade unions
- Persons with lived experience of exploitation, through organisations that support them

Effectiveness is to be evaluated through:

- Pre- and post-training assessments
- Feedback surveys
- Incident reporting trends and audit findings

8.5 Continuous Improvement

Group requirements provide for the following, applied in proportion to the scale and nature of the Group's activities at the time:

- Training extended from awareness sessions to structured modules for Tier 1 suppliers and key subcontractors
- Content tailored to reflect sector-specific risks in mining and exploration
- The briefing for executive management and the board extended to cover the Group's own modern slavery risk assessment and due diligence record
- Records of training outcomes retained for reporting

9 Monitoring and Evaluation

9.1 Overview

The effectiveness of measures to prevent modern slavery is required to be monitored, and those measures are required to be reviewed and, where a review identifies the need, revised. Monitoring and evaluation are directed at establishing whether the measures are achieving their intended outcomes and at identifying areas for improvement.

The monitoring and evaluation framework follows the OECD Due Diligence Guidance for Responsible Business Conduct, which recommends outcome-focused review.

9.2 Measures and Key Performance Indicators (KPIs)

9.2.1 Measures by Which Progress Is to Be Assessed

Area	KPI
Supply chain transparency	% of Tier 1 suppliers mapped and risk-assessed
Supplier compliance	% of suppliers completing self-assessments and audits
Worker protection	Number of grievances raised and resolved through formal channels
Training effectiveness	% of staff and suppliers trained; % reporting increased confidence in identifying risks

The values recorded against these measures are to be reported to the board.

This statement requires leading indicators, such as training completion and supplier onboarding checks, to be used alongside lagging indicators such as the number of concerns raised and how they were resolved.

9.3 Governance and Data Use

Executive management is responsible for setting the measures used, for collecting the data and for reporting the outcome.

Data is to be gathered through:

- Reviews of compliance and assessments of suppliers
- Grievance mechanism reports
- Training feedback and knowledge checks
- Stakeholder interviews and community consultations

Results are to be reviewed by executive management at least annually and reported to the board.

9.4 Evidencing Outcomes and Learning

The following are required to be recorded and reported:

- Grievances relating to labour conditions, and the time taken to resolve them
- Training completion across staff and across procurement teams

- Tier 1 supplier mapping coverage
- Feedback from community partners on the accessibility of grievance mechanisms

Group requirements provide for these records to inform the revision of training content, of supplier engagement and of the way risk is prioritised.

9.5 Stakeholder Engagement and Feedback

Feedback is to be sought from:

- Workers and community members to assess the effectiveness of grievance mechanisms
- Suppliers to gather feedback on due diligence processes
- Non-governmental organisations and trade unions, to validate the approach and identify gaps

This feedback is required to inform the monitoring and evaluation arrangements, and those arrangements are required to draw on worker experience.

9.6 Continuous Improvement

Group requirements provide for the following, applied in proportion to the scale and nature of the Group's activities at the time:

- The due diligence record described in section 7.6, extended to track the measures in section 9.2
- Outcome-based measures of remediation effectiveness
- Direct worker engagement in monitoring activities
- Benchmarking against industry practice and recognised standards

10 Continuous Improvement and Governance

10.1 How Priorities Are Set

Modern slavery prevention is applied as a standing requirement across the Group's business. Modern slavery risk changes as a business changes, so the approach is kept under review.

Priorities are set by executive management and approved by the board. They are derived from the risk assessment, the due diligence record, grievances received and stakeholder engagement. The priority areas set out in section 10.2 are requirements of this statement, applied in proportion to the scale and nature of the Group's activities at the time.

10.2 Priority Areas

10.2.1 Operational Integration

- Modern slavery risk controls integrated into operational planning
- Human rights and labour risk assessment integrated into environmental and social impact assessment
- Modern slavery clauses and supplier compliance requirements included in new contracts

10.2.2 Supply Chain Transparency

- Tier 1 supplier mapping, and Tier 2 mapping in high-risk categories
- The due diligence record described in section 7.6
- Participation in initiatives on responsible sourcing as section 3.3 provides

10.2.3 Worker-Centred Engagement

- Means by which workers may give their views directly, without being required to give a name
- Grievance procedures and training materials available in Spanish and other local languages
- Rights-based education delivered with local non-governmental organisations

10.2.4 Remediation and Accountability

- A remediation protocol structured against the Modern Slavery Response and Remedy Framework
- Provision for remedy on the basis required by this statement, where exploitation is identified in the supply chain
- Scenario-based testing of grievance and escalation procedures

10.2.5 Monitoring and Reporting

- Internal monitoring of modern slavery indicators against defined measures
- Human rights and modern slavery information recorded so that it can be reported
- Comparison against recognised responsible sourcing and human rights standards

10.3 Transparency

This statement is reissued on the cycle set out in section 1.4. Each reissue records the changes made to the arrangements described.

10.4 Revision history

10.4.1 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.

10.4.2 Version 2.0 - 01.01.2026

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

10.4.3 Version 1.0 - 16.06.2025

First issue.

10.4.4 Superseded versions

Superseded versions are retained.

11 Appendices

11.1 Appendix A - Glossary of Terms

Term	Definition
Modern Slavery	Slavery, servitude, forced or compulsory labour, debt bondage and human trafficking; in this statement the term also covers the worst forms of child labour.
Forced Labour	All work or service which is exacted from any person under the threat of a penalty and for which the person has not offered themselves voluntarily (ILO).
Child Labour	Work that deprives children of their childhood, their potential and their dignity, and that is harmful to their physical and mental development.
Due Diligence	A process to identify, prevent, mitigate and account for how a company addresses actual and potential adverse human rights impacts.
Salient Risk	A risk of severe negative impact on individuals, severity being assessed by reference to the scale, scope and remediability of the impact rather than to its likelihood alone.
Grievance Mechanism	A formal process that allows individuals or communities to raise concerns and seek remedy for adverse impacts.
Remediation	Actions taken to make good or compensate for harm caused, including restitution, rehabilitation or guarantees of non-repetition.
Employer Pays Principle	A principle stating that no worker should pay for a job; recruitment costs must be borne by the employer.
Tier 1 Supplier	A supplier that has a direct contractual relationship with the Group.
Tier 2 Supplier	A supplier of a Tier 1 supplier, with no direct contractual relationship with the Group.
Modern Slavery Response and Remedy Framework	A six-step model for responding to and remediating modern slavery, published by the Minderoo Foundation (Walk Free) with the Human Rights Resources and Energy Collaborative.

11.2 Appendix B - Relevant Policies and Frameworks

The following Xstreco documents support the prevention of modern slavery or the Group's wider ethical and compliance framework:

- Human Rights and Indigenous Rights Policy
- Responsible Sourcing and Supply Chain Policy

- Whistleblowing and Ethics Reporting Policy
- Social Performance and Community Engagement Policy
- Enterprise Risk Management Policy
- Equality, Diversity and Inclusion (EDI) Policy
- Health, Safety and Emergency Management Policy
- Anti-Corruption and Bribery Policy
- Anti-Money Laundering (AML) Policy
- Conflict of Interest Policy
- Fraud Policy
- Environmental Sustainability Policy
- Sanctions and Compliance Policy
- Tax Transparency Policy
- Supplier Code of Conduct
- Code of Conduct
- Information Governance and Security Policy
- Corporate Communications Policy
- Political Engagement Policy
- Competition Law Policy
- Climate Action Transition Plan (CATP)

These documents are reviewed on the cycle each states and are published at xstreco.com.

11.3 Appendix C - Reporting Channels and Contact Information

Xstreco encourages all stakeholders to report concerns related to modern slavery or unethical conduct through the following channels:

- Web reporting form: xstreco.com/report
- Email: compliance@xstreco.com or codeofconduct@xstreco.com (both reach the compliance function)
- Telephone: +41 41 562 32 90, asking for the compliance function
- Community grievance mechanism: Group requirements provide for a grievance mechanism at each site in Peru at which the Group carries out activity, from the start of that activity, and for the means of access to be made known locally
- Post, marked 'Confidential - Compliance':

Xstreco AG

General-Guisan-Strasse 6

CH-6300 Zug, Switzerland

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. Every report is treated seriously, assessed promptly and, where it requires investigation, investigated, and is handled confidentially, subject only to any disclosure that is required by law or is necessary for the enquiry, and then only to the extent necessary. Retaliation against a person who raises a concern in good faith is prohibited.

11.4 Appendix D - Regulatory References

Switzerland

- Swiss Criminal Code, Article 182 on human trafficking and Article 195 on the promotion of prostitution
- Swiss Criminal Code, Article 102 on corporate liability
- Swiss Code of Obligations, Articles 964j to 964l, and the Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour (SR 221.433)
- Federal Act on Data Protection and applicable Swiss employment law

Peru

- Texto Único Ordenado del Decreto Legislativo N.° 728, Ley de Productividad y Competitividad Laboral, approved by Decreto Supremo N.° 003-97-TR
- Ley N.° 29785, Ley del Derecho a la Consulta Previa a los Pueblos Indígenas u Originarios
- 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
- Código Penal, artículo 129-A (trata de personas), artículo 129-Ñ (esclavitud y otras formas de explotación) and artículo 129-O (trabajo forzoso), as renumbered by Ley N.° 31146, and Ley N.° 28950, Ley contra la trata de personas y el tráfico ilícito de migrantes

International Frameworks

- UN Guiding Principles on Business and Human Rights
- ILO fundamental Conventions Nos. 29, 87, 98, 100, 105, 111, 138, 155, 182 and 187
- OECD Due Diligence Guidance for Responsible Business Conduct
- UN Sustainable Development Goals, in particular target 8.7
- Home Office, Transparency in Supply Chains (TISC): Statutory Guidance, issued under section 54(9) of the UK Modern Slavery Act 2015 and reissued in 2025. Used as a reporting structure; it imposes no obligation on the Group at the date of this statement.

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

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