

The way we collaborate

Our Supplier Code of
Conduct and Expectations
for Ethical Business



xstreco

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1 Introduction

1.1 Purpose and Scope

This Supplier Code of Conduct sets the minimum standards Xstreco requires of all suppliers, contractors and business partners that provide goods or services to Xstreco AG and its subsidiaries.

In this Code, "Xstreco" and "the Group" mean Xstreco AG and its subsidiaries.

This Code is designed to:

- Set the standards required on human rights, environmental protection and anti-corruption
- Align with Xstreco's environmental, social and governance standards, values and risk management framework
- Support the supply chain due diligence required by Xstreco's Responsible Sourcing and Supply Chain Policy, which is structured against the OECD Due Diligence Guidance for Responsible Business Conduct and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

It applies to:

- Direct suppliers and contractors
- Subcontractors and affiliates of a supplier, through the supplier's obligations under section 6.3
- Intermediaries and agents
- Any third party acting on behalf of Xstreco

1.2 Applicability and Supplier Commitment

Through the incorporation of this Code into their contract with Xstreco, suppliers undertake to:

- Comply with this Code and all applicable laws and regulations
- Implement appropriate governance, risk, and compliance systems
- Cooperate with Xstreco's due diligence, audit, and reporting processes in accordance with section 9.1
- Report to Xstreco without delay any actual or suspected breach of a requirement of this Code of which they become aware, in accordance with section 9.3

Suppliers must take reasonable steps to cascade the standards in this Code through their own supply chains, as section 6.3 requires. 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 Code.

This Code applies to a supplier through its incorporation into the supplier's contract with Xstreco, by reference or otherwise. This Code is issued in English and in Spanish, and both versions have been drafted to the same meaning; where the supplier contract provides that one language version prevails, that version prevails.

Failure to meet a requirement of this Code is a breach of the supplier's contract with Xstreco and may result in a requirement for corrective action, in suspension, or in termination of the contract in accordance with its terms and with section 9.3.

In this Code, "must", "must not", "requires", "is prohibited" and "is responsible for" state requirements which are conditions of the business relationship, and the undertakings in section 1.2 are such requirements. "Should", "expected" and "encouraged" identify practices

Xstreco asks suppliers to adopt and takes into account in supplier assessment; they are not conditions of the business relationship. "May" identifies a discretion.

Where this Code requires a system or a disclosure, the requirement applies in proportion to the supplier's size, activities and risk exposure. Xstreco may specify in the contract the requirements that apply to a particular supplier.

1.3 Alignment with Xstreco's Values and Standards

This Code reflects Xstreco's core values of:

- Integrity - We act lawfully, ethically and transparently
- Responsibility - We take ownership of our actions and their impact on people, communities and the environment
- Discipline - We apply sound judgement, operational rigour and risk awareness
- Respect - We treat all stakeholders with fairness and dignity
- Resilience - We operate with foresight and adaptability

These values are set out in Xstreco's Code of Conduct. Suppliers are expected to conduct themselves consistently with these values and must meet the standards in this Code, including:

- Management of greenhouse gas emissions where their size, activities and emissions make it proportionate, as section 5.2 requires
- Prohibition of forced labour and child labour, as section 3.2 requires, and of corruption and bribery, as section 2.2 requires
- Transparent and traceable supply chains, as sections 6.1 and 6.4 require
- Respect for Indigenous rights and, as section 7.1 provides, engagement directed at Free, Prior and Informed Consent (FPIC)

1.4 Continuous Improvement and Collaboration

Suppliers operate in diverse contexts and with differing capability.

Xstreco may work with suppliers to:

- Build supplier capacity and awareness
- Support continuous improvement
- Share best practices and innovations
- Encourage alignment with recognised industry standards, including the ICMM Mining Principles and the ten principles of the UN Global Compact

Suppliers are encouraged to go beyond compliance and to contribute to sustainable development and responsible sourcing.

1.5 Updates and Revisions

The review and update of this Code are described in section 10.2. The following applies to revisions of this Code:

- The version of this Code that applies to a supplier is the version incorporated into its contract, unless the contract provides that the current version applies
- Xstreco notifies suppliers of each revision and, where the revision applies to a supplier, of the date from which it applies
- The current version is published at xstreco.com

2 Legal and Ethical Business Conduct

2.1 Compliance with Laws and Regulations

Suppliers must comply with all applicable international, national, and local laws and regulations in the jurisdictions where they operate.

This includes, but is not limited to, laws related to:

- Labour rights and working conditions
- Environmental protection and climate disclosure
- Occupational health and safety
- Anti-corruption and anti-bribery
- Trade, export controls, and sanctions
- Data protection and privacy
- Tax transparency and anti-money laundering

Suppliers are expected to implement internal controls and compliance systems that reflect the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and relevant ISO standards, including ISO 37301 on compliance management.

2.2 Anti-Corruption and Bribery

Suppliers must not engage in any form of corruption or bribery and must not make facilitation payments.

Suppliers must not:

- Offer, promise, give, or accept bribes or improper advantages
- Engage in kickbacks, extortion, or influence peddling
- Use third parties to circumvent anti-bribery rules

Suppliers must implement:

- Anti-corruption policies and procedures
- Training for relevant personnel
- Mechanisms for reporting and investigating suspected violations

Suppliers must comply with the anti-bribery laws applicable to them, including the Swiss Criminal Code provisions on bribery where Swiss law applies and the Código Penal where Peruvian law applies, and with any anti-bribery law that applies by reason of their own operations or listings.

2.3 Conflicts of Interest and Fair Competition

Suppliers must avoid situations where personal, financial, or political interests conflict with their obligations to Xstreco.

They must:

- Disclose to Xstreco any actual or potential conflict of interest affecting their dealings with Xstreco
- Avoid favouritism, nepotism, or self-dealing
- Refrain from engaging in anti-competitive practices such as price fixing, bid rigging, or market allocation

Suppliers must comply with all applicable competition and antitrust laws and act with transparency and fairness in all commercial dealings.

2.4 Sanctions, Trade and Anti-Money Laundering

Suppliers must comply with all applicable:

- International sanctions and embargoes
- Export control regulations
- Anti-money laundering and counter-terrorism financing laws

This includes:

- Screening business partners and transactions against the sanctions lists relevant to the dealing, including those of SECO (Switzerland), the United Nations and, where relevant, the European Union and the United States Office of Foreign Assets Control (OFAC)
- Avoiding transactions that obscure the origin or destination of funds or goods
- Maintaining accurate records, cooperating with the audits and investigations of the competent authorities, and cooperating with Xstreco's audits and assessments in accordance with section 9.1 and with its investigations in accordance with section 9.3

Suppliers must apply know-your-counterparty procedures proportionate to their activities, must report suspicious activity to the competent authorities where the law so requires, and must inform Xstreco of suspicious activity connected with their dealings with Xstreco to the extent the law permits.

2.5 Ethical Conduct and Transparency

Suppliers must:

- Conduct business ethically and transparently
- Maintain accurate books, records, and disclosures
- Avoid fraud, misrepresentation, and manipulation of data
- Cooperate with Xstreco's assessments in accordance with section 9.1

Xstreco encourages suppliers to adopt:

- Internal codes of ethics
- Whistleblower protection arrangements that go beyond the requirements of sections 3.6 and 9.2
- Compliance training programmes that go beyond the requirements of sections 2.2 and 10.1

3 Human Rights and Labour Practices

3.1 Respect for Human Rights

In this Code, internationally recognised human rights, and the standards of business conduct that apply to them, are those set out in:

- The Universal Declaration of Human Rights
- The UN Guiding Principles on Business and Human Rights (UNGPs)
- The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- The ILO fundamental Conventions

Suppliers must:

- Respect the dignity, rights, and freedoms of all individuals affected by their operations
- Avoid causing or contributing to adverse human rights impacts
- Implement human rights due diligence processes, including risk assessments, mitigation, and remediation

Where a supplier identifies an actual or potential adverse human rights impact connected with the goods or services it provides to Xstreco, it must take corrective action without delay and notify Xstreco.

3.2 Prohibition of Forced and Child Labour

Suppliers must ensure that:

- No form of forced, bonded, or indentured labour is used
- Workers are not required to surrender identity documents or deposits, and are not charged recruitment fees or related costs, which are borne by the employer
- Employment is freely chosen and workers may leave at any time with reasonable notice

Suppliers must not use child labour.

Suppliers must:

- Act consistently with ILO Convention No. 138 (minimum age) and ILO Convention No. 182 (worst forms of child labour)
- Not employ anyone under the legal minimum working age or under 15 years, whichever is higher
- Not assign anyone under 18 years to hazardous work, including work at a mine or exploration site
- Implement robust age verification procedures and remediation plans

3.3 Diversity, Inclusion and Non-Discrimination

Suppliers must provide a workplace free from discrimination, harassment, and abuse.

This includes:

- Equal opportunity in hiring, promotion, compensation, and access to training
- Prohibition of discrimination on any ground, including race, colour, ethnicity, national origin, sex, gender identity, sexual orientation, pregnancy, family status, age, religion, disability, political opinion and union membership, and any other ground protected by applicable law

Suppliers are encouraged to:

- Promote gender equity and inclusive leadership
- Support underrepresented groups and local hiring
- Align with Xstreco's Equality, Diversity and Inclusion (EDI) Policy

3.4 Freedom of Association and Collective Bargaining

Suppliers must respect the rights of workers to:

- Form or join trade unions of their choice
- Engage in collective bargaining
- Participate in lawful industrial action without fear of retaliation

Where these rights are restricted by law, suppliers must allow alternative forms of worker representation and dialogue.

Suppliers must:

- Not interfere with union activities
- Not discriminate against worker representatives
- Engage in good faith with worker representatives

3.5 Fair Wages and Working Conditions

Suppliers must ensure that:

- Wages meet or exceed the legal minimum and any applicable collective agreement
- Working hours comply with national law and ILO standards
- Overtime is worked only as the applicable law permits, is compensated at the premium rates the law requires and does not exceed legal limits
- Workers receive clear, written contracts in a language they understand

Suppliers must provide:

- Safe and clean working environments
- Access to potable water, sanitation, and rest areas
- Adequate personal protective equipment (PPE) and training

3.6 Grievance Mechanisms and Remedy

Suppliers must establish and maintain grievance mechanisms for their workers and, where their operations affect communities, for those communities.

These mechanisms must:

- Be aligned with the effectiveness criteria in Principle 31 of the UNGPs
- Allow a concern to be raised confidentially and without the person giving a name, and be free from retaliation or intimidation
- Be accessible, culturally appropriate and available in local languages
- Provide for timely and fair investigation and resolution

Suppliers must cooperate with Xstreco in addressing grievances and providing remedy where adverse impacts are identified.

4 Health, Safety and Wellbeing

4.1 Safe and Healthy Work Environment

Suppliers must provide a safe and healthy working environment for all workers, contractors, and visitors.

This includes:

- Identifying, assessing, and mitigating health and safety risks
- Complying with all applicable occupational health and safety laws and regulations

- Implementing safety management arrangements proportionate to the risks of their activities and, where their size and activities make it proportionate, aligned with ISO 45001
- Ensuring that all equipment, machinery, and infrastructure are maintained in safe working condition

Suppliers must foster a safety-first culture where:

- Work is stopped if unsafe conditions are identified
- Workers are empowered to report hazards without fear of retaliation
- Safety performance is monitored and continuously improved

4.2 Emergency Preparedness and Response

Suppliers must develop and maintain emergency preparedness and response plans, proportionate to the risks of their activities, that are:

- Site-specific and risk-based
- Regularly tested through drills and simulations
- Communicated clearly to all workers and contractors
- Coordinated with local emergency services and authorities

Plans must address:

- Fire, explosion, and chemical spills
- Natural disasters (e.g. earthquakes, floods)
- Medical emergencies
- Security threats and evacuation procedures

Suppliers must keep emergency exits, alarms and first aid equipment accessible and must maintain them in working order.

4.3 Contractor and Subcontractor Safety

Suppliers are responsible for the health and safety of all subcontractors and temporary workers under their control.

This includes:

- Ensuring that subcontractors are trained, qualified, and equipped to perform their tasks safely
- Monitoring subcontractor compliance with safety procedures
- Including safety requirements in contracts and onboarding processes

Suppliers must apply the same safety standards to subcontractors as to their own employees.

4.4 Occupational Health and Mental Wellbeing

Suppliers must take proactive steps to protect both the physical and mental health of workers.

This includes:

- Preventing exposure to hazardous substances and unsafe conditions
- Providing access to occupational health services and medical care
- Promoting mental wellbeing, taking reasonable steps to prevent work-related stress and burnout, and prohibiting harassment
- Supporting work-life balance and reasonable working hours

Suppliers are encouraged to implement Employee Assistance Programmes (EAPs) and wellness initiatives that support long-term health and resilience.

4.5 Fitness for Work and Fatigue Management

Suppliers must maintain arrangements so that personnel are fit to perform their duties safely.

This includes:

- Enforcing limits on working hours and mandatory rest periods
- Preventing and managing fatigue, substance use, and impairment
- Conducting fitness-for-duty assessments where appropriate
- Providing training on fatigue awareness and self-monitoring

Suppliers must require that their workers do not report to work under the influence of alcohol or drugs, or in any condition that may impair their ability to work safely.

5 Environmental Responsibility

5.1 Environmental Compliance and Risk Management

Suppliers must comply with all applicable environmental laws, regulations, and permits in the jurisdictions where they operate, and must manage the environmental risks of their activities.

This includes:

- Implementing environmental management arrangements proportionate to the environmental risks of their activities and, where their size and activities make it proportionate, an Environmental Management System (EMS) aligned with ISO 14001
- Identifying, assessing, and mitigating environmental risks and impacts
- Maintaining up-to-date environmental licences and documentation
- Reporting environmental incidents, spills, or violations to Xstreco without delay

Suppliers must take a precautionary approach to environmental protection and integrate sustainability into their operational decision-making.

5.2 Climate Action and Emissions Reduction

This Code requires suppliers, where their size, activities and emissions make it proportionate, to manage their greenhouse gas emissions and to work towards reducing them, by:

- Measuring and, where Xstreco so requests for its own value chain inventory, reporting greenhouse gas emissions in accordance with the Greenhouse Gas Protocol or ISO 14064-1
- Setting emissions reduction targets where their size and activities make it proportionate and, where they have the capacity to do so, seeking external validation of those targets
- Assessing renewable supply options in energy procurement and adopting low-carbon technologies where they are reasonably available
- Reducing emissions from transportation, logistics, and supply chain operations

Suppliers whose size and activities make it proportionate must disclose to Xstreco, on request, their climate-related risks and the measures taken to address them, structured against IFRS S2 Climate-related Disclosures, which incorporates the recommendations of the former Task Force on Climate-related Financial Disclosures.

5.3 Resource Efficiency and Waste Management

Suppliers must use natural resources efficiently and minimise waste generation.

This includes:

- Reducing water, energy, and raw material consumption
- Implementing the waste hierarchy: Reduce, reuse, recycle, recover, dispose
- Managing hazardous and non-hazardous waste in accordance with legal and industry standards
- Preventing pollution and contamination of air, soil, and water

Suppliers must maintain records of waste handling and disposal and ensure that third-party waste contractors are properly licensed.

5.4 Biodiversity and Land Use

Suppliers must avoid or minimise adverse impacts on biodiversity, ecosystems, and land use.

This includes:

- Conducting Environmental and Social Impact Assessments (ESIAs) where required
- Applying the mitigation hierarchy of avoidance, minimisation, restoration and offset
- Not carrying out exploration or mining activity in World Heritage properties, and complying with the legal regime that applies to any legally protected area in which they operate
- Recording the baseline condition of habitats before an activity proceeds

Where their activities affect land use, suppliers must engage with local communities and Indigenous Peoples on land use planning and must respect traditional land rights; that engagement must be conducted in accordance with section 7.1.

5.5 Tailings and Hazardous Materials Management

Suppliers involved in mining, processing, or logistics must manage tailings and hazardous materials responsibly.

This includes:

- Where a supplier designs, constructs, operates or closes a tailings storage facility, or provides services to one, performing that work in accordance with the Global Industry Standard on Tailings Management (GISTM) and Xstreco's specifications
- Properly labelling, storing, transporting, and disposing of hazardous substances
- Training workers in chemical safety and emergency response

Suppliers must report any material safety incident to Xstreco without delay and cooperate in investigations and remediation.

6 Responsible Sourcing and Supply Chain Integrity

6.1 Due Diligence and Risk-Based Assessment

Suppliers must implement a risk-based due diligence process to identify, prevent, and mitigate actual or potential adverse impacts in their supply chains.

This includes:

- Conducting supplier risk assessments based on geography, material, and sector
- Mapping their supply chains and, where they supply materials, maintaining traceability of those materials
- Integrating due diligence into procurement and contracting processes
- Where a supplier sources, trades or processes minerals, aligning its due diligence with the five-step framework of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

Suppliers must provide Xstreco with access to relevant documentation and cooperate in audits and assessments in accordance with section 9.1 and in investigations in accordance with section 9.3.

6.2 Conflict-Affected and High-Risk Areas (CAHRAs)

Suppliers sourcing from or operating in Conflict-Affected and High-Risk Areas (CAHRAs) must:

- Exercise enhanced due diligence in line with Annex II to the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- Avoid contributing to human rights abuses, conflict financing, or corruption
- Apply the risk management measures Annex II provides, namely:
 - Immediate suspension of or disengagement from suppliers linked to serious human rights abuses
 - Immediate suspension of or disengagement from suppliers linked to direct or indirect support to non-state armed groups
 - Where bribery, money laundering or fraudulent misrepresentation of mineral origin is identified, risk mitigation within a defined period, and suspension or disengagement where mitigation fails
 - Where direct or indirect support to public or private security forces that illegally control or tax mine sites or transport routes is identified, risk mitigation within a defined period, and suspension or disengagement where mitigation fails

Suppliers must comply with applicable UN sanctions and national laws governing trade from CAHRAs.

6.3 Sub-Supplier and Third-Party Compliance

Suppliers must take reasonable steps to ensure that their own suppliers, subcontractors, affiliates and business partners:

- Understand and comply with the standards in this Code
- Are subject to appropriate due diligence, monitoring, and contractual obligations
- Do not engage in practices that would breach a requirement of this Code

Suppliers must take corrective action where they identify in their supply chains conduct that would breach a requirement of this Code, and must mitigate a risk of such conduct that they identify.

6.4 Transparency and Traceability

Suppliers must maintain accurate and verifiable records of:

- Material origin and custody
- Supplier screening and onboarding
- Risk assessments and mitigation actions
- Grievances and remediation outcomes

Where a supplier supplies materials, it must support traceability of those materials through the chain of custody, including by participating in a chain of custody scheme recognised in its sector where such a scheme applies to those materials.

7 Community and Cultural Engagement

7.1 Indigenous Rights and Free, Prior and Informed Consent (FPIC)

Suppliers must respect the rights, cultures, and traditions of Indigenous Peoples and local communities.

This includes:

- Not initiating, on Xstreco's behalf, any activity that may affect the lands, resources or livelihoods of Indigenous Peoples except within the consultation required by applicable law and the engagement directed at Free, Prior and Informed Consent conducted under Xstreco's Human Rights and Indigenous Rights Policy
- Engaging in meaningful consultation processes that are inclusive, culturally appropriate, and conducted in good faith
- Avoiding any form of coercion, manipulation, or misinformation
- Documenting and honouring agreements made with Indigenous communities

Suppliers must conduct their activities consistently with the rights recognised in:

- ILO Convention No. 169
- The UN Declaration on the Rights of Indigenous Peoples (UNDRIP)
- IFC Performance Standard 7, in the edition in force at the time
- Xstreco's Human Rights and Indigenous Rights Policy, in the version published by Xstreco at the time

7.2 Cultural Heritage and Local Partnerships

Suppliers must identify, protect, and respect tangible and intangible cultural heritage that may be affected by their operations.

This includes:

- Conducting cultural heritage assessments as part of environmental and social impact studies
- Avoiding disturbance of sacred sites, burial grounds, or culturally significant landscapes
- Consulting the affected communities and the competent cultural authorities where their activities may affect cultural heritage
- Respecting local traditions, languages and knowledge systems in the conduct of their activities

Suppliers are encouraged to:

- Partner with local artisans, educators, and cultural institutions
- Promote cultural awareness and sensitivity training for their workforce

7.3 Grievance Mechanisms and Social Impact

Suppliers must establish and maintain grievance mechanisms for communities affected by their operations, meeting the requirements of section 3.6.

In line with those requirements, these mechanisms must in particular:

- Be aligned with the effectiveness criteria in Principle 31 of the UNGPs
- Allow a concern to be raised confidentially and without the person giving a name
- Be free from retaliation or intimidation
- Provide for timely and fair investigation and resolution of grievances

Suppliers must:

- Monitor and assess the social impacts of their activities
- Engage in ongoing dialogue with communities and stakeholders
- Take account of local priorities and the UN Sustainable Development Goals (SDGs) in any community development initiative they support

8 Information and Data Protection

8.1 Confidentiality and Intellectual Property

Suppliers must protect all confidential, proprietary, and commercially sensitive information obtained through their relationship with Xstreco.

This includes:

- Business strategies, financial data, and technical specifications
- Trade secrets, know-how, and unpublished material relating to patents, trademarks and copyright
- Personal data of employees, customers, and stakeholders

Suppliers must:

- Use such information only for authorised purposes
- Prevent unauthorised access, disclosure, or misuse
- Return or securely destroy confidential information upon request or contract termination

Suppliers must respect the intellectual property rights of Xstreco and third parties and refrain from unauthorised use, reproduction, or distribution.

8.2 Cybersecurity and Digital Conduct

Suppliers must implement robust cybersecurity measures to protect systems, networks, and data from unauthorised access, loss, or attack.

This includes:

- Maintaining up-to-date firewalls, antivirus software, and encryption
- Applying secure authentication and access controls
- Monitoring for vulnerabilities and responding to incidents promptly
- Training employees on cybersecurity awareness and phishing prevention

Suppliers must notify Xstreco without delay in the event of a data breach or cyberattack affecting Xstreco's information or systems, or a suspected compromise of them.

8.3 Responsible Use of AI and Emerging Technologies

Suppliers must use Artificial Intelligence (AI) and other emerging technologies responsibly and ethically.

This includes:

- Designing and operating AI systems so that they are transparent, fair and accountable
- Avoiding bias, discrimination, or harm in automated decision-making
- Not using AI to manipulate, surveil, or exploit individuals or communities
- Complying with the regulation of artificial intelligence applicable to them

Suppliers must not input Xstreco's confidential or proprietary data into public AI platforms or tools without prior written consent.

8.4 Data Privacy and Compliance

Suppliers must comply with the data protection laws applicable to them, including, as applicable:

- The Swiss Federal Act on Data Protection (FADP)
- Ley N.º 29733, Ley de Protección de Datos Personales (Peru)
- The EU General Data Protection Regulation (GDPR), and any other data protection law of a jurisdiction in which the supplier operates

This includes:

- Collecting and processing personal data lawfully, fairly, and transparently
- Limiting data use to specified, legitimate purposes
- Implementing appropriate technical and organisational safeguards

Suppliers must cooperate with Xstreco in responding to data subject requests and regulatory inquiries.

9 Monitoring, Reporting and Enforcement

9.1 Supplier Audits and Performance Reviews

Xstreco may assess supplier compliance with this Code by:

- On-site audits, carried out on reasonable notice, or without notice where Xstreco has reasonable grounds to suspect a serious breach, during working hours and subject to the supplier's reasonable safety, security and confidentiality requirements, with costs borne as the contract provides
- Desktop reviews of policies, procedures, and records
- Self-assessments and supplier questionnaires
- Third-party verification or certification schemes

Suppliers must:

- Cooperate with these assessments and give access to the relevant records, premises and personnel
- Implement corrective actions where non-compliance is identified
- Address the findings of audits and assessments within the agreed period

Audit findings may influence supplier risk ratings, contract renewals, and sourcing decisions.

9.2 Reporting Concerns and Whistleblower Protection

The duty of a supplier to notify Xstreco of an actual or suspected breach of a requirement of this Code is set out in section 9.3. Suppliers' employees and stakeholders are encouraged to report any concerns related to:

- Breaches of a requirement of this Code
- Unethical, illegal, or unsafe conduct
- Human rights or environmental abuses
- Fraud, corruption, or retaliation

Reports may be submitted:

- Through the channels set out in Appendix C, which are those provided for in the Whistleblowing and Ethics Reporting Policy
- In English or in Spanish
- Without giving a name or contact details; a concern raised without them is assessed in the same way

Retaliation against a person who raises a concern in good faith is prohibited. Suppliers must also protect whistleblowers within their own organisations and ensure that their grievance mechanisms meet the requirements of section 3.6, and in particular are:

- Accessible and confidential
- Culturally appropriate and available in local languages
- Aligned with the effectiveness criteria in Principle 31 of the UNGPs

9.3 Corrective Actions and Termination

Where a breach of a requirement of this Code is identified, Xstreco requires the supplier to:

- Investigate the issue and determine root causes
- Develop and implement a Corrective Action Plan (CAP)
- Monitor progress and verify resolution

Whether or not a corrective action plan has been agreed, Xstreco may, in accordance with the terms of the relevant contract and without prejudice to any other right:

- Suspend or terminate the business relationship where:
 - The breach of a requirement of this Code is serious or repeated
 - The supplier fails to cooperate in an investigation
 - The supplier is unable or unwilling to remediate
- In addition, report illegal conduct to the competent authorities

Suppliers must notify Xstreco without delay if they become aware of any actual or suspected breach of a requirement of this Code.

10 Implementation and Continuous Improvement

10.1 Supplier Training and Awareness

Suppliers must ensure that all relevant personnel - including employees, contractors, and subcontractors - are:

- Aware of the requirements and expectations set out in this Code
- Trained on applicable legal, ethical, environmental, and human rights standards
- Equipped to identify and manage ESG risks in their operations and supply chains

Training must be:

- Role-specific and risk-based
- Conducted regularly and updated as needed
- Documented and evaluated for effectiveness

Xstreco may offer or recommend training resources to support supplier capacity-building.

10.2 Review and Updates

This Code is reviewed at least once in every two calendar years, and whenever a change in the law, a material change in Xstreco's activities or an event arising under this Code, including a lesson from an audit or incident, makes a review necessary. It is updated where the review so requires, to reflect:

- Changes in applicable law and regulation, including Articles 964j to 964l of the Swiss Code of Obligations where they apply to the Group
- Emerging risks, technologies, and stakeholder expectations
- Lessons learned from audits, incidents, and industry developments

Suppliers are responsible for:

- Reviewing each revision of this Code notified by Xstreco
- Where a revision applies to them, adjusting their policies and practices accordingly
- Communicating updates to their own suppliers and partners

Where a revised version applies to a supplier, Xstreco may request written confirmation of compliance with the revised requirements.

10.3 Contact and Support Channels

Suppliers may contact Xstreco for:

- Clarification of Code requirements
- Guidance on implementation or risk mitigation
- Reporting of concerns or suspected violations
- Access to training, tools, or templates

Contact channels for guidance and support:

- Email: compliance@xstreco.com
- Concerns: the channels in Appendix C

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. Each revision is communicated to those subject to this Code.

11 Appendices

11.1 Appendix A: Glossary of Key Terms

Term	Definition
CAHRAs	Conflict-Affected and High-Risk Areas, as defined by the OECD
Code of Obligations, Articles 964j to 964l	Articles 964j to 964l of the Swiss Code of Obligations and the associated ordinance, requiring due diligence and reporting on minerals from conflict-affected areas and on child labour
Due Diligence	A structured process to identify, prevent, mitigate and account for actual and potential adverse impacts
ESG	Environmental, Social, and Governance - a framework for assessing sustainability and ethical impact
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 the engagement conducted under section 7.1 is directed at consent.
GISTM	Global Industry Standard on Tailings Management
OECD Guidelines	Multilateral standards for responsible business conduct issued by the Organisation for Economic Co-operation and Development
UNGPs	UN Guiding Principles on Business and Human Rights - the global standard for preventing and addressing human rights abuses in business operations

11.2 Appendix B: Reference Standards and Frameworks

This Code is informed by the following standards, frameworks and legal instruments, in addition to the laws identified in the body of this Code; a reference to a standard is to the edition listed, where an edition is listed, and otherwise to the edition in force at the time, and in each case to any edition that replaces it:

- UN Guiding Principles on Business and Human Rights (UNGPs)
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- 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)
- IFRS S2 Climate-related Disclosures
- ILO fundamental Conventions
- ICMM Mining Principles and Performance Expectations (2024)
- OECD Due Diligence Guidance for Responsible Business Conduct
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- Universal Declaration of Human Rights
- ILO Convention No. 169 and the UN Declaration on the Rights of Indigenous Peoples (UNDRIP)
- IFC Performance Standards, including Performance Standard 7

- Greenhouse Gas Protocol Corporate Standard and ISO 14064-1:2018
- The ten principles of the UN Global Compact
- Global Industry Standard on Tailings Management (GISTM)
- ISO 37301:2021, with Amendment 1:2024 - Compliance management systems
- ISO 20400:2017 - Sustainable procurement
- ISO 14001:2026 - Environmental management systems
- ISO 45001:2018, with Amendment 1:2024 - Occupational health and safety management systems
- ISO/IEC 27001:2022, with Amendment 1:2024 - Information security management systems
- ISO/IEC 27701:2025 - Privacy information management systems

11.3 Appendix C: Contact and Reporting Channels

Requests for clarification, guidance and support may be sent to compliance@xstreco.com. A concern may be raised through the following channels, which are those provided for in the Whistleblowing and Ethics Reporting Policy:

- 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
- 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.

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

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