

Atalaya Riotinto Minera is a Spanish company belonging to the Atalaya Mining group, dedicated to the extraction and processing of minerals to produce copper concentrate at the historic Riotinto deposit in the Cuenca Minera area of Huelva.

COMPLIANCE POLICY

The Board of Directors and Management of Atalaya Riotinto Minera are aware of the broad impact of their production and corporate activities on society and are firmly committed to conducting mining operations in a sustainable manner, both from the environmental and social point of view, and in full compliance with all applicable legislation. Thus, ATALAYA rejects any practice contrary to current regulations or to the values and principles expressed in its Code of Ethics. This Policy is aligned with the company's culture of integrity and respect for rules and expresses its willingness to uphold conduct that is respectful of regulations and ethical values. The Policy includes the following commitments:

- 01/ To generate and foster a culture of compliance with legal and other voluntarily assumed obligations. This is achieved through the conduct of the administrators and members of senior management, who lead by example and shall react immediately whenever any risk or breach of regulations or ethical standards may be detected.
- 02/ To assess any risks that may be incurred and to develop a compliance model and a procedural framework that facilitate effective implementation of this Policy by assigning responsibilities in this area to all members of the Organisation.
- 03/ To ensure and uphold the independence of the Compliance department within the Organisation, providing it with the material and human resources necessary to carry out its responsibilities.
- 04/ To establish a philosophy of zero tolerance for conduct that may constitute a breach of regulations and/or approved internal policies and procedures, and to apply, where necessary, the contractual, disciplinary or punitive measures provided for in labour regulations.
- 05/ To establish a secure and confidential Ethics and Whistleblowing Channel that enables recipients of this Policy to report any breaches or violations hereof and/or of external and internal regulations of which they are aware or suspect, with confidentiality guaranteed in all cases.
- 06/ To promote distribution and awareness of this Policy and the Compliance systems among both the people who make up the Company and third parties related to it, so that they know and understand the importance of complying with them as a condition to continuing their relationship with the Company.
- 07/ To train and raise awareness among all employees in the Organisation about the importance of Compliance as a tool that guarantees sustainable and responsible corporate management.
- 08/ To continuously review, evaluate and update all Compliance systems to ensure their alignment with best practices, analysing risks on a regular basis to keep the model up to date and guarantee proper control.

Based on its commitment to zero tolerance for any illegal act, the Board of Directors of Atalaya Riotinto Minera assumes responsibility for implementing, documenting and maintaining a Compliance and Corporate Defence System as a basic

tool for developing the principles established in this Policy. Every director, manager and employee of the company accepts their responsibility within the Compliance System and is required to apply the principles of Compliance in all their actions.



Alberto Lavandeira
Sole Administrator

10 May 2023