

Whistleblowing Policy

1. INTRODUCTION

- 1.1 Hochschild Mining PLC (“Hochschild” or “the Company”) is committed to maintaining the highest standards of honesty, openness and accountability. It will therefore treat malpractice very seriously whether it is committed by Directors, managers, employees, suppliers or contractors.
- 1.2 Hochschild recognises that individuals working for the organisation will usually know when someone in the organisation may be doing something illegal or improper but, may find it difficult to raise concerns that they may have about misconduct, negligence or wrongdoing. This policy and procedure is designed to provide a means for employees to raise their genuine concerns so that they can be investigated properly, sensitively and in confidence. It is also designed to ensure individuals are protected from suffering any form of detrimental reprisal as a consequence of raising a concern in good faith.
- 1.3 This policy and procedure provides a means of dealing with issues of misconduct, negligence or wrongdoing that contravene Hochschild’s business interests or the law and those that fall into the categories listed below. It is not intended to replace the organisation’s internal grievance procedure which remains the appropriate method of dealing with issues of a personal nature relating to matters of employment.
- 1.4 If an individual genuinely believes that Hochschild, or any Employee, has taken, or has failed to take, action that they reasonably believe will lead to, or amount to, any of the following below, they should raise the matter initially with the relevant country General Manager or the relevant Vice President. Matters can be raised orally or in writing:
- A criminal offence, including fraud, corruption, bribery or blackmail;
 - A failure to comply with any legal or regulatory obligations;
 - Deliberate and serious misrepresentation of information;
 - Danger to the health and safety of employees or the public; and
 - Actions intended to conceal any of the above.

2. PRINCIPLES

- 2.1 This policy is designed to offer protection to those Employees who disclose such concerns provided the disclosure is made in good faith and of the reasonable belief by the individual making the disclosure that it tends to show misconduct, negligence or wrongdoing on condition that they make the disclosure to an appropriate person, as set out below. It is important to note that no protection from internal disciplinary procedures is available to those who choose not to use these procedures. In an extreme case, malicious or untrue allegations could give rise to legal action by the persons complained about.

- 2.2 The Company will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the individual making the disclosure may need to provide a statement as part of the evidence required.
- 2.3 No Employee or other person employed by Hochschild will be punished or subjected to detrimental action as a result of making a disclosure in accordance with this procedure if the disclosure is made in good faith. Any harassment, victimisation or less favourable treatment of any Employee on such grounds will be treated as a disciplinary offence which may include dismissal.
- 2.4 This policy encourages individuals to put their name to any disclosures they may make as this would facilitate a thorough investigation into the matter. Concerns expressed anonymously may be considered at the discretion of the Company.
- 2.5 If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. If, however, an individual makes malicious or vexatious allegations, disciplinary action may be taken against that individual.

3. PROCEDURES FOR MAKING A DISCLOSURE

- 3.1 Employees who in good faith and with the reasonable belief that someone in the organisation is doing something illegal or improper may raise the concerns they have about such misconduct, negligence or wrongdoing as follows:
- Complaints of misconduct, negligence or wrongdoing should be raised with the Country General Manager, Head of Internal Audit or the Vice President of Human Resources.
 - If the complaint involves any of the Vice Presidents, the employee may report such misconduct, negligence or wrongdoing directly to the Chief Executive Officer or the Head of Internal Audit.
 - Complaints against the Head of Internal Audit, the CEO or any other Executive Director may be raised directly with the Board Chair or the Chair of the Company's Audit Committee.
- 3.2 Once a complainant has reported their concern, the person with whom it has been raised will assess, as quickly as possible, what action should be taken to initiate the appropriate enquiries and will provide an assessment on how the proceedings will be undertaken, usually within five days. This will often lead to a formal investigation which, depending on the findings, will determine the action to be taken and the timescales involved thereafter. The investigating officer will keep the complainant informed on the outcome of any enquiries and investigations and of any actions taken, providing that does not impact on the Company's duty of confidentiality to others. The complainant will be advised if the complaint falls more properly within other policies such as policies relating to discipline or grievance.

- 3.3 Should none of the above routes be suitable or acceptable to the complainant, then the complainant can approach one of the following individuals who have been designated and trained as independent points of contact under this procedure. They can advise the complainant on the implications of the legislation and the possible internal and external avenues of complaint open to them:

Head of Internal Audit

Address: Calle La Colonia 180, Lima Peru
Telephone: 511-317-2000

Human Resources Manager

Address: Calle La Colonia 180, Lima Peru
Telephone: 511-317-2000

Chair of the Audit Committee c/o Company Secretary

Address: 17 Cavendish Square, London W1G 0PH
Telephone: 44-20 3709 3260

4. PUBLIC INTEREST DISCLOSURE ACT

- 4.1 All UK Employees will be protected under the Public Interest Disclosure Act 1998 (as supplemented by additional rights under The Enterprise and Regulatory Reform Act 2013), where they make a protected disclosure. These are disclosures of information, which in the reasonable belief of the Employee making the disclosure, is in the public interest which may include the following:

- A criminal offence has been, is being or is likely to be committed.
- That a person has failed, is failing or is likely to have failed to comply with any legal obligation to which they are subject.
- A miscarriage of justice has occurred or is likely to occur.
- The health or safety of an individual has been, is being or is likely to be endangered.
- That the environment has been, is being or is likely to be damaged, and
- That information relating to the above is being deliberately concealed.

- 4.1 Employees in other territories will be treated by the Company as if such legislation applied to them.

Last Reviewed by the Audit Committee
on 16 November 2022