Whistleblowing Policy

1. INTRODUCTION

1.1 Hochschild Mining PLC and each of its direct and indirect subsidiaries and affiliates (collectively, the "**Group**") is committed to maintaining and conducting our business with the highest standards of honesty, openness and accountability and we expect all workers to uphold these high standards. We therefore treat misconduct very seriously, whether it is committed by our directors, managers, employees, suppliers, contractors or customers. A culture of openness and accountability is essential in order to prevent such situations occurring and to address them when they do occur.

1.2 This policy and procedure:

(a) applies to all individuals working for or on behalf of the Group in any capacity, at all levels and grades, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, casual workers and agency staff, volunteers, interns, agents, sponsors, or any other person associated with us, or any of our subsidiaries or their employees, wherever located (collectively referred to as "**workers**"), our customers and suppliers;

(b) is designed to encourage our workers, suppliers and customers to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated properly and sensitively as appropriate, and that their confidentiality will be respected;

(c) provides guidance on how to raise any concerns or issues of misconduct, negligence or wrongdoing that contravene the Group's business interests or the law; and

(d) aims to reassure our workers, customers and suppliers that they can raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

1.3 This policy is not intended to replace the Group's internal grievance procedures which remain the appropriate method of dealing with issues of a personal nature relating to matters of employment, nor does it form part of any contract of employment or other contract to provide services. Accordingly, we may amend this policy at any time, without notice.

2. WHAT IS WHISTLEBLOWING?

2.1 Whistleblowing is the disclosure of information which relates to suspected wrongdoing or illegal, immoral, illicit, unsafe, unethical or fraudulent activities or behaviour at work. This may include information about:

(a) criminal activities, including fraud, money laundering, corruption, bribery or blackmail;

(b) market abuse, insider trading or market manipulation;

(c) any failure to comply with any legal or regulatory obligations;

(d) deliberate and serious misrepresentations of information;

(e) dangers to the health and safety of our workers or the public;

(f) breaches of our Anti-Bribery and Corruption, Anti-Fraud Policies, or the Group's Code of Conduct;

(g) any form of harassment in the workplace;

(h) breach of sanctions;

(i) modern slavery and human rights breaches;

(j) anti-competitive behaviour;

(k) data privacy violations;

(l) significant harm to the environment;

(m) unauthorised disclosures of our confidential information;

(n) failures to comply with our reporting requirements internally or to any regulatory authority; or

(o) actions intended to conceal, hide or destroy evidence of any of the above.

2.2 A whistleblower is a person who raises a genuine concern relating to any of the above.

2.3 If an individual genuinely believes that the Group, or any of its workers, customers or suppliers has taken, or has failed to take, any action that they reasonably believe will lead to, or amount to, any of the above, they are encouraged to report the matter through the Company's Whistleblowing Portal. Alternatively, reports can be made, orally or in writing, to the individuals set out in section 5 below.

3. PRINCIPLES

3.1 This policy is designed to offer protection to those workers and, where possible, to other parties, who disclose such concerns. We hope that in many cases you will be able to raise any concerns with either your line manager or the Human Resources Department, either in writing or in person. They may be able to agree a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to the individuals listed in section 5 below.

3.2 However, if the matter is more serious or you feel that your line manager or the Human Resources Department has not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the individuals listed in section 5 below.

3.3 It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken. The Group will treat all such disclosures in a confidential and sensitive manner, and your identity will be kept confidential so long as it does not hinder or frustrate any investigation. You may need to provide a statement as part of the evidence required.

3.4 It is the Group's policy that no one will be punished or subjected to any detrimental action as a result of making a disclosure in accordance with this procedure. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. Any harassment, victimisation or less favourable treatment of any person making such a disclosure by a worker will be treated as a disciplinary offence which may include dismissal.

3.5 You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action.

4. CONFIDENTIALITY

4.1 We hope that staff will feel able to voice whistleblowing concerns openly under this policy. However, if you want to raise your concern confidentially, we will make every effort to keep your identity secret. If it is necessary for anyone investigating your concern to know your identity, we will discuss this with you.

4.2 We do not encourage staff to make disclosures anonymously, however if you do so, we will still make every effort to investigate your disclosures. You should be aware that proper investigation may be more difficult or impossible if we cannot contact you confidentially to obtain further information from you. It is sometimes more difficult to determine the credibility of allegations if they are made anonymously. Whistleblowers who are concerned about possible reprisals if their identity is revealed should come forward to the individuals listed in section 5 below and appropriate measures can then be taken to preserve confidentiality.

5. PROCEDURES FOR MAKING A DISCLOSURE

5.1 Persons who wish to file a report may do so through the Whistleblowing Portal. Reports submitted through the Portal will be distributed to the Chair of the Audit Committee, the Vice President of Human Resources, the Head of Internal Audit & Compliance Officer, and the Company Secretary. Alternatively, reports can be made, orally or in writing, to the following persons:

Head of Internal Audit & Compliance Officer
Address: Calle La Colonia 180, Lima, Peru
Telephone: +511-317-2000
Email: tomas.sangio@hocplc.com

Vice President of Human Resources
Address: Calle La Colonia 180, Lima, Peru
Telephone: +511-317-2000
Email: eduardo.villar@hocplc.com

Chair of the Audit Committee c/o Company Secretary
Address: 21 Gloucester Place, London W1U 8HR, United Kingdom
Telephone: +44 (0)20 3709 3260
Email: raj.bhasin@hocplc.com

5.2 Once a whistleblower has reported their concern, we will carry out an initial assessment, to determine the scope of any investigation as quickly as possible and 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(s) will keep the whistleblower informed on the outcome of any enquiries and investigations and of any actions taken. However, sometimes the need for confidentiality may prevent us giving the whistleblower specific details of the investigation, an outcome or any disciplinary action taken as a result. A whistleblower should treat any information about the investigation as confidential. The whistleblower will be advised if the complaint falls more properly within other policies such as policies relating to discipline or grievance.

5.3 If we conclude that a whistleblower has made false allegations maliciously, the whistleblower will be subject to disciplinary action.

5.4 Should none of the above routes be suitable or acceptable to you, then you may approach one of the individuals above who have been designated and trained as

independent points of contact under this procedure. They can advise you on the possible internal and external avenues of complaint open to you.

6. EXTERNAL DISCLOSURES

6.1 This policy provides an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

6.2 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external. For UK-based workers, the independent whistleblowing charity, Protect, (https://protect-advice.org.uk), offers a confidential helpline (+44 (0)20 3117 2520). Protect also has a list of prescribed regulators for reporting certain types of concerns on their website.

6.3 Whistleblowing concerns usually relate to the conduct of our workers, but they may sometimes relate to the actions of a third party, such as our customers, clients, suppliers or service providers. In some circumstances the law will protect you if you raise the matter with the third party directly. However, we encourage you to report such concerns internally first, in line with this policy.

7. PUBLIC INTEREST DISCLOSURE ACT

7.1 All UK-based workers are 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. A protected disclosure is a disclosure of information, which in the reasonable belief of the person making the disclosure, is in the public interest. This may include the following:

(a) a criminal offence has been, is being or is likely to be committed;

(b) a person has failed, is failing or is likely to have failed to comply with any legal obligation to which they are subject;

(c) a miscarriage of justice has occurred or is likely to occur;

(d) the health or safety of an individual has been, is being or is likely to be endangered;

(e) the environment has been, is being or is likely to be damaged; or

(f) any information relating to the above is being deliberately concealed.

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

Approved by the Audit Committee of Hochschild Mining PLC
19th November 2025