

Assessment of Company Expectations 2025/26

Company adherence to the Expectations for EITI supporting companies

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| Company name | Minsur |
| Sector | Mining |
| Headquarters | Lima, Peru |
| Type | Publicly listed |
| Date of submission to company (month/year) | January 2026 |
| PREAMBLE MSG Participation | <i>Pursuant to the Guidance on the Expectations for EITI supporting companies, companies are encouraged to participate in national EITI multi-stakeholder groups (MSGs). This data is collected for information purposes.</i> |
| Does the company participate in a multi-stakeholder group? | No |
| If yes, indicate in which countries the company is participating in MSGs? | N/A |
| Secretariat comment on MSG participation | The Secretariat thanks the many companies directly and indirectly participating in MSGs in EITI implementing countries and encourages supporting companies to take part in MSGs in the EITI implementing countries in which they operate. |
| EXPECTATION 1 Public support for the EITI | <i>Publicly declare and publish support for the EITI and the objective of the EITI Association to make the EITI Principles and the EITI Standard the internationally accepted standard for transparency in the oil, gas and mining sectors.</i> |
| Does the company publish a statement of support for | Yes |

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| the EITI and the objective of the EITI Association? | |
| URL for Statement Support | Sustainability Report 2024: https://www.minsur.com/wp-content/uploads/2025/05/Reporte-de-Sostenibilidad-2024-2.pdf |
| Secretariat's assessment on Expectation 1 | Expectation met |
| Secretariat comment | Statement of support published. See URL pgs. 25, 27 and 102. |
| EXPECTATION 2 <i>Disclosures in accordance with the EITI Standard</i> | <i>Make comprehensive disclosures in accordance with the EITI Standard in all EITI implementing countries where the company or its controlled subsidiaries operate. Where not disclosed in other company reporting, publicly disclose a list of controlled subsidiaries operating in the oil, gas or mining sectors in EITI implementing countries.</i> |
| Does the company publish a list of controlled subsidiaries? | Yes |
| URL for controlled list of subsidiaries | Annual Report 2024 (ES): https://stportalwebminsurprd.blob.core.windows.net/documentos/Memoria-Anual-Minsur-2024%20(1)_e162f5b1-e211-4742-997b-218f56c01b19.pdf |
| EITI implementing countries where the company operates. | PERU |
| Does the company make disclosures in accordance with the EITI Standard or in relation to EITI implementing countries? | Yes |
| Secretariat's assessment on Expectation 2 | Expectation met |
| Secretariat comment | The company discloses a list of controlled subsidiaries within the 2024 Annual Report. See URL p. 75. Company assessed as making disclosures in accordance with EITI Standard. |

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| <p>EXPECTATION 3</p> <p><i>Disclosure of taxes and payments in non-EITI implementing countries</i></p> <p><i>Publicly disclose taxes and payments to governments at a project level in line with the EITI Standard in all non-EITI implementing countries where the company operates unless disclosure is not feasible. Where not feasible, the country-specific legal or practical barriers to disclosure should be publicly explained.</i></p> | |
| <p>Does the company publicly disclose taxes and payments to governments in non- EITI implementing countries where the company operates upstream in the oil, gas and mining sectors?</p> | <p>N/A</p> |
| <p>URL to disclosures of taxes and payments to governments in non-EITI implementing countries</p> | <p>Sustainability Report 2024: https://stportalwebminsurd.blob.core.windows.net/documentos/FileIngles_aded199b-23e1-4a24-82aa-96497618b030</p> <p>Consolidated Financial Statements 2024: https://stportalwebminsurd.blob.core.windows.net/documentos/FileIngles_d423ca26-d74f-4581-8b17-e142ffac6763</p> |
| <p>Are the disclosures disaggregated by project?</p> | <p>N/A</p> |
| <p>Secretariat's assessment on Expectation 3</p> | <p>Expectation not applicable</p> |
| <p>Secretariat comment</p> | <p>Minsur does not operate in non-EITI implementing countries.</p> |
| <p>EXPECTATION 4</p> <p><i>Commodity trading transparency</i></p> <p><i>Companies buying oil, gas and/or mineral resources from the state in EITI implementing countries, disclose volumes received and payments made in line with the EITI Standard and the EITI reporting guidelines for companies buying oil, gas and minerals from governments unless disclosure is not feasible.</i></p> | |
| <p>Does the company buy oil, gas, and/or mineral resources from the state in EITI-implementing countries?</p> | <p>No</p> |

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| If yes, which countries? | N/A |
| Does the company make disclosures in line with the EITI Standard and reporting guidelines? | N/A |
| URL for disclosure(s) | N/A |
| Secretariat's assessment on Expectation 4 | Expectation not applicable |
| Secretariat comment | Minsur does not buy oil, gas and/or mineral resources from the state in EITI implementing countries. |
| EXPECTATION 5 <i>Disclosure of audited financial statements</i> | <i>In line with the EITI Standard, publicly disclose audited financial statements, or the main items (i.e., balance sheet, profit/loss statement, cash flows) where financial statement are not available.</i> |
| Does the company disclose its audited financial statements? | Yes |
| URL audited financial statements | Consolidated Financial Statements 2024: https://stportalwebminsurd.blob.core.windows.net/documentos/FileIngles_d423ca26-d74f-4581-8b17-e142ffac6763 |
| Secretariat's assessment on Expectation 5 | Expectation met |
| Secretariat comment | Minsur discloses audited financial statements. See URL. |
| EXPECTATION 6 <i>Beneficial ownership transparency</i> | <i>Publicly declare and publish support for beneficial ownership transparency and publicly disclose beneficial owners in line with EITI Standard, recognising that listed companies will disclose the name of the stock exchange, include a link(s) to stock exchange filings where they are listed and otherwise do what is required by applicable regulations and listing requirements.</i> |
| Does the company publish a statement of support for | Yes |

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| beneficial ownership transparency? | |
| URL for statement of support for Beneficial Ownership | Sustainability Report 2024: https://stportalwebminsurprd.blob.core.windows.net/documentos/FileIngles_aded199b-23e1-4a24-82aa-96497618b030 |
| Does the company disclose beneficial owners, either directly or according to stock exchange regulations and listing requirements? | Yes |
| Where disclosures are made according to stock exchange regulations, please provide the name of the stock exchange | Lima Stock Exchange (Bolsa de Valores de Lima) |
| URL to stock exchange | BVL: www.bvl.com.pe Website: https://www.minsur.com/inversiones-reportes |
| URL for recent beneficial ownership disclosures | |
| Secretariat's assessment on Expectation 6 | Expectation met |
| Secretariat comment | Minsur publishes a statement of support for beneficial ownership transparency. See URL Sustainability Report 2024 p. 102. The company discloses beneficial owners in line with applicable regulations and listing requirements. The company is listed on the Lima stock exchange. See URL BVL. |
| EXPECTATION 7 <i>Due diligence processes and anti-corruption policies</i> | <i>All EITI supporting companies are expected to engage in rigorous due diligence processes and publish an anti-corruption policy setting out how the company manages corruption risk, including how the company collects and takes risk-based steps to use beneficial ownership data regarding joint venture partners, contractors, and suppliers in its processes.</i> |

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| <p>Does the company publish an anti-corruption policy?</p> | <p>Yes</p> |
| <p>URL to the policy</p> | <p>Corporate Anti-Corruption and Anti-Bribery Policy: https://stportalwebminsurprd.blob.core.windows.net/documentos/FileIngles_e92a66a3-3d25-49ab-8393-339b222ed54f</p> <p>Detailed Anti-Bribery Policy: https://stportalwebminsurprd.blob.core.windows.net/documentos/FileIngles_f79c7510-9c09-442a-9dad-6e794d1f3c1d</p> <p>Sustainability Report 2024: https://stportalwebminsurprd.blob.core.windows.net/documentos/FileIngles_aded199b-23e1-4a24-82aa-96497618b030</p> <p>Due Diligence Report 2024: https://stportalwebminsurprd.blob.core.windows.net/documentos/FileIngles_4f5cbedd-4a2f-4213-a0e7-fc8309908608</p> |
| <p>Does the company's anti-corruption policy describe how the company manages corruption risk with regards to identification and use of beneficial ownership data?</p> | <p>Yes</p> |
| <p>Secretariat's assessment on Expectation 7</p> | <p>Expectation met</p> |
| <p>Secretariat comment</p> | <p>Minsur publishes an anti-corruption policy. See URLs.</p> <p>Minsur's anti-corruption framework outlines how the company manages corruption risk, including through the identification and use of beneficial ownership data. The framework is based on two key policies: the Corporate Anti-Corruption Policy and the Detailed Anti-Corruption Policy. These policies apply to all employees, subsidiaries, affiliates, and third parties acting on behalf of the company, including contractors, suppliers, and customers. The policy prohibits all forms of improper and facilitation payments and define the responsibilities for compliance with the anti-corruption polices in the organisation.</p> <p>The Detailed Anti-Corruption Policy establishes risk-based measures to mitigate corruption risks in various business</p> |

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| | <p>activities, setting out specific rules on gifts, hospitality, and donations. It also defines various potential forms of corruption and includes procedures for record keeping, procurement, hiring, and entering into agreements with third parties. The policy requires a reasonable and documented due diligence process when engaging third parties, and the company's 2024 Sustainability Report (page 102) notes that this process includes the collection of beneficial ownership information. The policy also outlines potential penalties for non-compliance.</p> <p>The company publishes details of its due diligence process within the Due Diligence Report 2024. See URL.</p> |
| <p>EXPECTATION 8 Contract transparency</p> | <p><i>Publicly declare and publish support for governments' efforts to publicly disclose contracts and licenses that govern the exploration and exploitation of oil, gas and minerals in line with the EITI Standard, and contribute to public disclosure of contracts and licenses in EITI implementing countries consistent with government procedures.</i></p> |
| <p>Does the company publish a statement of support for contract transparency?</p> | <p>Yes</p> |
| <p>URL for statement of support for contract transparency</p> | <p>ICMM Joint Statement: https://www.icmm.com/en-gb/our-work/mineral-resource-governance/contract-transparency</p> |
| <p>Does the company contribute to public disclosure of contracts and licenses in EITI-implementing countries consistent with government procedures?</p> | <p>Yes</p> |
| <p>Secretariat's assessment on Expectation 8</p> | <p>Expectation met</p> |
| <p>Secretariat comment</p> | <p>As an ICMM member, the Secretariat notes that the company subscribes to ICMM's collective statement of support for contract transparency.</p> <p>Company assessed to contribute to disclosure of contracts and licenses in EITI implementing countries.</p> |

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| | The Secretariat encourages the company to publish a statement of support for governments efforts to disclose contracts and licences on its own website. |
| EXPECTATION 9 Gender Diversity | <i>Publish a commitment and/or policy on gender diversity in the oil, gas or mining sectors and support reporting by EITI implementing countries under the EITI Standard by disclosing employment in the sectors disaggregated by gender.</i> |
| Does the company publish a commitment/policy on gender diversity? | Yes |
| URL for commitment/policy on gender diversity | Diversity and Inclusion Policy: https://stportalwebminsurprd.blob.core.windows.net/documentos/FileIngles_5dc1a172-56a9-4133-a8c3-a32973927307 Code of Ethics and Conduct: https://stportalwebminsurprd.blob.core.windows.net/documentos/FileIngles_4334de4b-688b-496e-a60b-c8be1ff40591 |
| Does the company disclose employment data disaggregated by gender? | Yes |
| URL for gender disaggregated employment data | Sustainability Report 2024: https://stportalwebminsurprd.blob.core.windows.net/documentos/FileIngles_aded199b-23e1-4a24-82aa-96497618b030 |
| Secretariat's assessment on Expectation 9 | Expectation met |
| Secretariat comment | Minsur publishes a commitment and/or policy on gender diversity. See URLs. Minsur publishes employment data disaggregated by gender. See URL pgs. 112-125. This gendered employment data is further disaggregated by occupational area and level as well as age, contract type and region. |