

COMPETITION LAW POLICY SPCC
(Public Extract)

Southern Peru Corporate Corporation, sucursal del Perú (SPCC) reaffirms its strong commitment to strict compliance with the applicable Peruvian Competition Law regulations, ensuring that all business activities are conducted in full respect of free market participation, transparency, and the ethical principles that govern competitive markets.

APPLICATION:

Compliance with this policy is mandatory for all personnel, as well as for agents, consultants, and third parties acting on behalf of or representing SPCC, particularly those engaged in commercial, procurement, sales activities, or who have interactions with competitors.

GENERAL GUIDELINES:

1. The guiding principles are oriented toward rejecting any conduct that may restrict, impede, or distort free competition, reaffirming the obligation of personnel and third parties to act with integrity and in adherence to applicable regulations.
2. Any questions or concerns may be directed to the Legal Department or the Compliance Team at SPCC (ocumplimiento@southernperu.com.pe).
3. Reports or complaints may be submitted through the Sistema Integral de Denuncias (SID):

Website: <http://spcc.lineadedenuncia.net/>

Email: spcc@lineadedenuncia.net

Telephone: 080078258

ETHICAL CONDUCT:

1. SPCC conducts its business operations in full compliance with the Peruvian Anticompetitive Conduct Repression Law and maintains mutual respect toward its competitors, avoiding comments or statements that may be adverse to them.
2. SPCC avoids any action that may involve the exchange of sensitive information, collusion, or abuse of dominant market position.
3. SPCC strictly observes INDECOPI's directives during the execution of contractual activities.
4. Participation in business associations, professional groups, and industry forums must align with the functions performed and ensure that such participation serves legitimate purposes that facilitate the proper management of matters of common interest.

PROHIBITIONS:

SPCC prohibits:

1. Entering into formal or informal agreements with any SPCC competitor aimed at unduly preventing, restricting, or distorting free competition in the market.
2. Engaging in acts that constitute abuse of dominant position, including using or taking advantage of such position to unjustifiably exclude, hinder, or obstruct a competitor's presence in the market.
3. Executing vertical collusive practices that prevent, restrict, or distort free competition within the supply chain or in interactions with third parties.