THIRD PARTY COMPLIANCE GUIDE

CI INFINITA PROSPERIDAD MINERA S.A.S.

1. CORPORATE STATEMENT AND PURPOSE

CI INFINITA PROSPERIDAD MINERA S.A.S., an international trading company engaged in the purchase and export of mine material containing gold and silver, conducts its business activities under the principles of integrity, legality, transparency, sustainability, and responsible corporate governance.

The Company recognizes that modern business relationships require more than commercial efficiency. They require trust, ethical conduct, regulatory compliance, and a shared commitment to responsible value chains.

As part of its Integrated Compliance Framework, CI INFINITA PROSPERIDAD MINERA S.A.S. has adopted internal policies and controls designed to prevent risks related to money laundering, terrorist financing, corruption, bribery, fraud, conflicts of interest, reputational exposure, and unethical business practices.

This Third Party Compliance Guide has been issued to communicate the minimum standards of conduct expected from any third party that maintains, or seeks to maintain, a commercial, contractual, operational, or strategic relationship with the Company.

The purpose of this document is to promote transparent, lawful, and sustainable business relationships built on mutual accountability and long-term trust.

2. SCOPE OF APPLICATION

This Guide applies, where relevant, to all external counterparties interacting with the Company, including but not limited to:

- Suppliers of goods and services
- Mineral suppliers
- Contractors and subcontractors
- Transport and logistics providers
- Freight forwarders and customs-related operators

- National and international customers
- Commercial intermediaries and agents
- Advisors and consultants
- Strategic partners
- Representatives acting on behalf of the Company
- Any third party whose relationship may create operational, legal, financial, or reputational impact

The Company may apply different levels of review, monitoring, and due diligence depending on the nature of the relationship, transaction profile, country risk, operational relevance, or overall risk exposure.

3. CORE BUSINESS PRINCIPLES

CI INFINITA PROSPERIDAD MINERA S.A.S. expects all business relationships to be conducted in accordance with internationally recognized principles of ethical and responsible business behavior.

3.1 Legality

All activities must be carried out in full compliance with applicable laws, regulations, sanctions regimes, and contractual obligations.

3.2 Integrity

Business decisions must be based on legitimate commercial criteria and must never be influenced by improper payments, hidden interests, or unethical advantages.

3.3 Transparency

Information provided to the Company must be accurate, complete, timely, and reasonably verifiable.

3.4 Good Faith

The Company values relationships based on honesty, cooperation, fairness, and genuine intent to comply.

3.5 Shared Responsibility

Compliance is not a unilateral burden. Sustainable business relationships require active commitment from all parties involved.

3.6 Sustainability

Commercial success should be aligned with environmental responsibility, social awareness, and long-term value creation.

4. COMPLIANCE COMMITMENT

CI INFINITA PROSPERIDAD MINERA S.A.S. maintains an Integrated Compliance Program designed to identify, prevent, mitigate, and monitor relevant legal and ethical risks.

Third parties are expected to maintain business practices consistently with this approach and to demonstrate adequate standards of governance, legitimacy, and operational transparency.

Accordingly, counterparties are expected to:

- Conduct legitimate business activities
- Maintain valid legal and corporate authorizations
- Keep reliable records and supporting documentation
- Cooperate with reasonable compliance requests
- Disclose relevant ownership or management changes
- Notify material events that may affect the relationship
- Respond truthfully to verification processes

Failure to meet these standards may affect onboarding decisions, ongoing business relationships, or contractual continuity.

5. ZERO TOLERANCE FOR CORRUPTION AND BRIBERY

CI INFINITA PROSPERIDAD MINERA S.A.S. adopts a strict zero-tolerance approach toward all forms of corruption, bribery, facilitation payments, fraud, influence peddling, kickbacks, or improper business advantages.

No commercial objective justifies unethical conduct.

5.1 Prohibited Conduct

Third parties must not, directly or indirectly:

- Offer or give money, gifts, favors, or anything of value to improperly influence decisions

- Request improper payments in exchange for approvals or commercial opportunities
- Use agents or intermediaries to channel unlawful benefits
- Manipulate tendering or contracting processes
- Submit false or misleading documentation
- Create fictitious invoices or sham transactions
- Promise future benefits to Company personnel or representatives
- Engage in any conduct that could violate anti-bribery laws

5.2 Gifts and Hospitality

Reasonable and lawful business courtesies may be acceptable when transparent, infrequent, proportionate, and not intended to influence judgment.

Any gift, hospitality, or benefit capable of creating undue influence, conflict of interest, or reputational concern is unacceptable.

5.3 Responsibility for Associated Persons

Where a third party operates through employees, agents, consultants, subcontractors, or representatives, it is expected to promote standards equivalent to those described in this Guide.

5.4 Consequences of Non-Compliance

Where corruption or bribery risks are identified, the Company may take actions including:

- Rejection of onboarding requests
- Suspension of negotiations
- Enhanced review measures
- Contract termination
- Restriction of future business opportunities
- Reporting to competent authorities where appropriate

Integrity is a non-negotiable condition of doing business with the Company.

6. ANTI-MONEY LAUNDERING, COUNTER-TERRORIST FINANCING AND DUE DILIGENCE

CI INFINITA PROSPERIDAD MINERA S.A.S. recognizes that certain industries, supply chains, and cross-border commercial activities may be exposed to risks involving money laundering, terrorist financing, sanctions evasion, concealment of beneficial ownership, fraud schemes, or misuse of legitimate business structures.

Given the nature of its operations, the Company maintains controls intended to identify, assess, and mitigate such risks through a risk-based compliance approach consistent with applicable regulations and internationally accepted standards.

All third-party relationships are expected to be supported by legitimate economic purpose, operational transparency, and reliable documentation.

6.1 Expected Standards from Third Parties

Third parties are expected to:

- Conduct lawful and legitimate business activities
- Maintain consistency between their business profile and transaction volumes
- Provide accurate, complete, and current information
- Disclose ultimate beneficial ownership where relevant
- Inform the Company of material ownership, management, or control changes
- Cooperate with reasonable compliance inquiries
- Maintain appropriate accounting and transaction records

6.2 Risk-Based Due Diligence

Prior to onboarding, and periodically during the relationship, the Company may perform due diligence measures proportionate to the level of risk involved.

Such reviews may include:

- Corporate and legal verification
- Identity and ownership checks
- Beneficial ownership analysis
- Public records and adverse media screening
- Sanctions and restricted party screening
- Reputational assessment
- Operational capacity review
- Financial consistency review

- Requests for supporting documentation
- On-site or virtual visits when appropriate

6.3 Reservation of Rights

The Company reserves the right to decline onboarding, suspend discussions, or reassess existing relationships whenever material inconsistencies, unresolved red flags, lack of cooperation, or unacceptable risk exposure are identified.

7. MINERAL TRACEABILITY AND RESPONSIBLE SOURCING

As a participant in the precious metals supply chain, CI INFINITA PROSPERIDAD MINERA S.A.S. considers mineral traceability and lawful sourcing to be essential pillars of responsible business conduct.

The Company promotes commercial relationships only with counterparties committed to legal origin, transparent supply chains, and responsible sourcing standards.

7.1 Traceability Expectations

Where applicable, third parties should be able to demonstrate, to a reasonable extent:

- Lawful origin of the material
- Identity of relevant supply chain actors
- Coherence between production capacity and supplied volumes
- Supporting commercial and operational documentation
- Legitimate chain of custody
- Compliance with applicable regulatory requirements

7.2 Red Flag Situations

The Company may apply enhanced scrutiny or refrain from engagement where indicators arise such as:

- Unclear or unverifiable origin of material
- Inconsistent production volumes
- Cash-intensive unexplained structures
- Use of opaque intermediaries
- Missing permits or supporting records
- Material links to illegal mining or criminal environments

7.3 Responsible Supply Chain Commitment

Third parties are expected to support ethical sourcing principles and to avoid participating in transactions that may contribute to illegality, environmental harm, or serious social misconduct.

8. SUSTAINABILITY, ENVIRONMENTAL RESPONSIBILITY AND ESG EXPECTATIONS

CI INFINITA PROSPERIDAD MINERA S.A.S. believes that long-term commercial success must be aligned with environmental stewardship, social responsibility, and sound governance practices.

The Company values counterparties that actively incorporate sustainability principles into their operations.

8.1 Environmental Expectations

Third parties are encouraged to maintain practices such as:

- Compliance with applicable environmental laws and permits
- Responsible management of waste, emissions, and hazardous materials
- Efficient use of water, energy, and natural resources
- Preventive controls against avoidable environmental impacts
- Continuous improvement in environmental performance

8.2 Social Responsibility

The Company values counterparties that maintain respectful engagement with workers, communities, and stakeholders, particularly in areas affected by extractive or industrial activities.

8.3 Governance and Accountability

Strong governance practices, ethical leadership, internal controls, and transparent decision-making are positive indicators in the Company’s overall third-party assessment.

Sustainability maturity may be considered when evaluating long-term strategic relationships.

9. HUMAN RIGHTS, LABOR STANDARDS AND DIGNIFIED TREATMENT

CI INFINITA PROSPERIDAD MINERA S.A.S. rejects any form of abuse, exploitation, discrimination, or violation of fundamental rights and expects third parties to uphold equivalent standards.

9.1 Minimum Expectations

Third parties are expected to promote practices consistent with:

- Respect for human dignity
- Safe and respectful workplaces
- Non-discrimination and equal treatment
- Prohibition of child labor
- Prohibition of forced or compulsory labor
- Compliance with applicable labor regulations
- Respectful treatment of employees, contractors, and communities

9.2 Conduct Toward Company Personnel

Any interaction with Company employees or representatives must remain professional, respectful, and free from intimidation, harassment, coercion, or undue pressure.

9.3 Reputational Considerations

Serious allegations or verified misconduct involving labor abuse, human rights violations, or systemic mistreatment may affect the Company's willingness to initiate or continue business relationships.

10. INFORMATION SECURITY, CONFIDENTIALITY AND DATA PROTECTION

During legitimate business interactions, third parties may access the Company's commercial, technical, strategic, operational, financial, or personal information.

Such information is considered valuable and must be handled responsibly.

10.1 Minimum Obligations

Third parties are expected to:

- Use information only for authorized purposes
- Prevent unauthorized disclosure or misuse
- Apply reasonable physical and digital safeguards

- Restrict internal access on a need-to-know basis
- Notify relevant security incidents where appropriate
- Return or securely dispose of information when required

10.2 Confidential Information May Include

- Commercial terms and pricing
- Financial information
- Internal procedures and controls
- Strategic plans
- Customer and supplier information
- Investigative matters
- Operational data
- Protected personal data

10.3 Continuing Obligation

Confidentiality obligations may continue after the termination of the contractual or commercial relationship.

10.4 Personal Data Protection

Where personal data is processed, third parties are expected to comply with applicable privacy and data protection laws and to implement reasonable safeguards.

11. HONESTY CHANNEL AND REPORTING OF CONCERNS

CI INFINITA PROSPERIDAD MINERA S.A.S. promotes a culture of transparency, accountability, and timely action regarding any conduct that may jeopardize legality, ethical standards, business integrity, or stakeholder trust.

As part of this commitment, the Company has established a formal reporting mechanism known as the **Honesty Channel**, through which third parties may report, in good faith, concerns regarding suspected misconduct, irregularities, or situations inconsistent with this Guide or applicable law.

The Company values responsible speaking-up behavior as an important element of effective compliance culture.

11.1 Matters That May Be Reported

Reports may include, among others:

- Bribery or corruption concerns

- Fraud or falsification of documents
- Conflicts of interest not properly disclosed
- Improper requests for payments or benefits
- Suspicious transactions or traceability concerns
- Misuse of confidential information
- Harassment, abusive conduct, or serious misconduct
- Regulatory breaches or unethical practices
- Any matter capable of causing material legal or reputational harm

11.2 Official Reporting Channels

Third parties may submit reports through the following official channels:

Telephone:
0180009560666

Primary Email:
reportes@canaldehonestidad.com

Website:
www.canaldehonestidad.com

Additional Compliance Contact:
oficialdecumplimiento@ciinfinita.com

11.3 Reporting Principles

The Honesty Channel operates under the following principles:

- Reasonable confidentiality
- Fair and objective review
- Respectful treatment of all parties involved
- Protection against retaliation for good-faith reports
- Responsible handling of information
- Appropriate escalation where necessary

Reports should be made honestly and responsibly, based on genuine concerns or known facts.

12. INTERNAL REVIEWS, INVESTIGATIONS AND DUTY TO COOPERATE

Where concerns are reported or red flags are identified, CI INFINITA PROSPERIDAD MINERA S.A.S. may conduct internal assessments, compliance reviews, or formal investigations, depending on the nature and severity of the matter.

Such processes are intended to protect the Company, preserve business integrity, and ensure fair handling of relevant issues.

12.1 Confidentiality of Investigations

Internal investigations are treated as confidential internal matters. Information relating to reports, interviews, findings, supporting records, and case management will be accessed only by duly authorized persons with a legitimate need to know.

This approach seeks to:

- Protect the integrity of the review process
- Prevent unnecessary reputational harm
- Safeguard reporting parties and participants
- Support fairness and due process
- Preserve sensitive corporate information

12.2 Cooperation Expected from Third Parties

Where lawful and reasonably necessary, the Company may request clarifications, documents, or cooperation from third parties connected to a matter under review.

Third parties are expected to provide:

- Timely responses
- Truthful and complete information
- Reasonable cooperation
- Respect for confidentiality obligations

Failure to cooperate, obstruction, or the provision of false information may be considered in future business decisions.

13. CONSEQUENCES OF NON-COMPLIANCE

CI INFINITA PROSPERIDAD MINERA S.A.S. considers compliance an essential condition of trustworthy business relationships.

Accordingly, serious, repeated, or material breaches of this Guide may result in proportionate measures depending on the nature of the issue, risk level, contractual framework, and surrounding circumstances.

Possible actions may include:

- Requests for clarification or remediation
- Corrective action plans
- Enhanced monitoring measures
- Temporary suspension of onboarding or transactions
- Rejection of commercial proposals
- Restriction of certain business activities
- Contract termination, where contractually or legally permitted
- Disqualification from future opportunities
- Reporting to competent authorities where appropriate

The Company seeks to apply decisions in a fair, documented, and risk-based manner.

14. ACKNOWLEDGMENT AND COMMITMENT

Depending on the nature of the relationship, risk profile, strategic relevance, or regulatory context, the Company may request formal acknowledgment of this Guide from third parties.

Such acknowledgment may be provided through:

- Signed declarations
- Electronic acceptance
- Contractual incorporation by reference
- Email confirmation
- Supplier onboarding certifications
- Annual compliance attestations

Suggested Commitment Statement

The undersigned confirms that it has reviewed the Third Party Compliance Guide of CI INFINITA PROSPERIDAD MINERA S.A.S. and commits to conducting its relationship with the

Company in accordance with principles of legality, integrity, transparency, and responsible business conduct.

15. FINAL CORPORATE MESSAGE

CI INFINITA PROSPERIDAD MINERA S.A.S. believes that the strongest business relationships are not built solely on price, speed, or operational capacity, but on trust, consistency, and ethical conduct.

For this reason, the Company seeks to engage with organizations and individuals who share a modern vision of responsible enterprise, lawful growth, transparent trade, and sustainable value creation.

Doing business with the Company means participating in a value chain committed to integrity, traceability, accountability, and high professional standards.

Integrity is not an accessory to business success — it is the foundation of lasting partnerships.