

## CRIMINAL COMPLIANCE POLICY

This Policy, which forms the basis of the Criminal Compliance Model of ATLANTIC COPPER, intends to promote a **TRULY ETHICAL CULTURE** and to inform all managers and employees, as well as third parties and collaborators that deal with ATLANTIC COPPER, of **our firm opposition to the commission of criminal offenses**, as well as to convey our intention to prevent such acts, in accordance with our ethical values and principles of **SECURITY, INTEGRITY, RESPECT, EXCELLENCE and COMMITMENT** established in our Principles of Business Conduct ("PBC") and our firm commitment to ensure that they are complied with. The key elements of our Criminal Compliance Model are:

- **Compliance with the Law and internal policies:** Observance of the Law and zero tolerance towards unlawful acts.
- **Policies and procedures:** Establishment of adequate policies and procedures to reasonably prevent the different criminal risks that may result from the activities of ATLANTIC COPPER.
- **Awareness** and promotion, at all levels, of the principles adopted and the rules of behavior reflected in the policies and procedures of ATLANTIC COPPER.
- Regular **identification and assessment** of the activities that may have the potential of generating criminal risks.
- Establishment of adequate **controls** in the processes which may in theory be susceptible of generating criminal risks.
- **Obligation to report potentially illicit behaviors:** The obligation to communicate through the made available Whistleblowing Channels any behavior that contravenes either the principles established in the PBC or those established in this Policy or in the Criminal Compliance Manual. Should criminal behavior be detected, ATLANTIC COPPER will apply the corresponding disciplinary measures in a proportionate and fair manner.
- The **Crime Prevention Committee** has the authority and independence for the design, implementation, communication, oversight and **continuous improvement** of the ATLANTIC COPPER Criminal Compliance Model.

This Policy, which has been approved by the Board of Directors of ATLANTIC COPPER, binds and applies, without exception, to all managers, employees and collaborators of ATLANTIC COPPER.

Madrid, September 6<sup>th</sup>, 2019



Richard C. Adkerson  
Chairman of the Board



Kathleen L. Quirk  
Member of the Board



Javier Targhetta  
President  
("Consejero Delegado")