CODELCO

CODELCO – SUPPLY CHAIN DUE DILIGENCE FOR MINERALS

I. RESPONSIBLE SOURCING

Corporación Nacional de Cobre de Chile (Codelco) is a state-owned company and one of the world's leading copper mining companies since 1971. Codelco creates value for Chile through responsible and sustainable mining, developing its own operations and strategic partnerships with third parties, contributing to the country's development and to the supply of key minerals for the energy transition. In addition to our main metal, copper, our portfolio also includes molybdenum, gold, silver, rhenium, and sulfuric acid.

Codelco is an integrated copper producer, with mining operations, smelters, and refineries. The company currently owns and operates eight divisions: El Teniente, Ventanas, Andina, Salvador, Gabriela Mistral, Ministro Hales, Radomiro Tomic, and Chuquicamata. It also holds minority interests in productive operations in Chile, such as El Abra (49%), Inca de Oro (30.6%), Anglo American Sur (20%), and Quebrada Blanca (10%).

Codelco recognizes the importance of responsible sourcing of its mineral's supply and requires its suppliers to maintain the same approach under which it operates, commitment to ethical, safe, and responsible business practices aligned with our purpose and core values.

Since 2023, Codelco has implemented a supply chain due diligence management system aligned with international responsible mineral sourcing standards, such as the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High Risk Areas (CAHRA) and the Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel, and Zinc (JDD).

II. MANAGEMENT SYSTEM

Codelco's supply chain due diligence management system is designed to identify, assess, and manage risks associated with human rights violations, financial crimes such as corruption, money laundering, bribery, and the financing of terrorism or armed groups within its mineral supply chain. This system applies to all company divisions: Headquarters, El Teniente, Ventanas, Andina, Salvador, Gabriela Mistral, Ministro Hales, Radomiro Tomic, and Chuquicamata.

To achieve this, Codelco has implemented the procedure PR-2.0.6 Supply Chain Due Diligence, which defines the scope of the management system, roles and responsibilities, the methodology for identifying red flags, as well as the risk management and verification processes.

As part of the system, a Due Diligence Committee has been established, composed by the Commercialization and Corporate and Sustainability Affairs departments. Its responsibilities involve reviewing the implementation of the procedure for the purchase and evaluation of mineral suppliers, reviewing and validating risk management plans, recommending the review and planning of audits of Codelco's assets (smelter refinery), if necessary, among others. During 2025, the committee met once.

Codelco's sustainability policy demonstrates our commitment to ensure responsible production with the purpose of preventing, identifying, assessing, and managing any form of conflict or severe impacts on human rights, financial crimes, and/or financing of terrorism or armed groups, safeguarding ethical standards in our business and supply chain.

We have an accessible grievances mechanism for all employees, suppliers, and stakeholders available in our website; we also publish statistics of all complaints received and their investigation status quarterly.

During 2025, we strengthened our due diligence capabilities through training our commercial teams, which allowed us to raise our level of commitment and improve the support provided to suppliers in resolving deficiencies, as well as strengthen communication with commercial teams throughout the value chain, optimizing the flow of strategic information and facilitating risk-based decision making.

The management system is evaluated annually to monitor its effectiveness. During 2025, system indicators showed that the management system worked properly.

III. IDENTIFICATION AND EVALUATION OF RED FLAGS

As part of the due diligence process, we assess potential risks for all our mineral suppliers. To do this, we collect information from our suppliers using the Know Your Counterparty (KYC) form, through which we gather critical information on governance, health and safety protocols, environmental management systems, supply chain due diligence, legal compliance, and sustainability practices. This information is validated through documentation provided by the supplier and stored in Codelco's SharePoint system.

We also use the Conflict Affected and High Risk Area (CAHRA) Determination Tool to identify potential red flags within our mineral supply chain. This tool uses reliable and verifiable sources of information in conflicts, human rights, and governance, and is regularly updated.

During 2025, we evaluated 100% of our mineral suppliers. The management system worked effectively, as the information collected through the KYC form identified 16 potential red flags, either due to the origin of the mineral or companies with operations or participation in countries considered CAHRA, triggering a detailed review of each red flag.

For each case, public sources were consulted, including the supplier's website with a special focus on their responsible sourcing policies and implemented due diligence systems. Additionally, business information services and media sources were reviewed. This evaluation confirmed that the suppliers have solid due diligence systems, discarding the initial risk identified; consequently, all initially identified red flags were cleared.

V. RISK MANAGEMENT

If potential or existing risks of adverse impacts such as severe human rights violations or support to non-state armed groups were detected, Codelco will immediately suspend commercial relationships with the involved counterparties.

For other confirmed risks identified in evaluations, Codelco will require a risk management plan with mitigation measures, goals, and monitoring indicators. If after six months the proposed actions show no evidence of risk mitigation, Codelco may suspend or terminate the relationship with the supplier for at least three months or until substantial improvements are demonstrated.

To date, no risks have been confirmed in Codelco's mineral supply chain; therefore, no risks management plans have been required.

VI. INDEPENDENT THIRD PARTY AUDITS

Codelco holds the Copper Mark seal across all its divisions and has met the criteria of the Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel, and Zinc / Criterion 31 of the Copper Mark Risk Readiness Assessment Criteria Guide 2.0. These certifications validate that Codelco's supply chain due diligence system is aligned with the five steps of the OECD guidance.

The results of the audit process are available on the Copper Mark website; the revaluation process of all our divisions is scheduled for 2026.