



**CODE OF CONDUCT  
FOR BUSINESS  
PARTNERS**

April 2023

# Contents

Commitments and purpose	3
Scope	4
Minimum expectations	5
ESG risk management	5
Occupational health and safety	6
Ethics, integrity and transparency	7
Human rights	8
Labor aspects	9
Community relations	10
Environment	11
Product characteristics	12
Implementation of the Code	13
Reporting mechanisms	14
Acceptance	15
Examples of relevant sustainability performance indicators for the management of the Grupo México supply chain	16
References	17
Glossary	18

# Commitments and Purpose

At Grupo México, we promote ethical and responsible business practices through our ongoing commitment to our values, our people, the environment and corporate social responsibility. Our vision and commitments in sustainable development are laid out in our [Company Policies](#) and [Code of Ethics](#). All Grupo México, S.A.B. (“Grupo México” or “the Organization”) Mining, Transportation (GMXT) and Infrastructure division (companies and subsidiaries – including Southern Copper Corporation) management and employees, in all countries where Grupo México has operations, are required to uphold our organizational principles and values in their daily tasks and duties.

We know that our performance and reputation are not determined solely by the conduct of our people, but also by the conduct of everyone with whom we do business, including our business partners (suppliers, contractors, commercial and business partners), who are a natural extension of the impact and image of our organization.

We therefore share with you here our principles and values, with the expectation that our business partners will respect and promote them.

This Code of Conduct for Business Partners (the “Code”) outlines the responsibilities and expectations regarding the ethical and responsible business practices we expect of our business partners. This Code provides the minimum expectations in Environmental, Social and Governance (ESG) aspects to promote and encourage our supply chain to act accordingly and to actively support the United Nations Sustainable Development Goals (SDG) and the 10 Principles of the Global Compact, and also Grupo México’s commitments to sustainable development as laid out in our [Sustainable Development Policies](#).



# Scope

All Business Partners that provide goods and services for or on behalf of Grupo México, our affiliates, subsidiaries and business units, in all jurisdictions where we operate, are expected to comply with this Code, adopting policies that are aligned with this Code.



# Minimum Expectations

## i. ESG Risk Management

We strive to systematically identify and eliminate or mitigate the environmental, social and governance (ESG) risks associated with our activities and operations. We expect the same commitment from our Suppliers and Contractors.

#	Topic	Expectation
1	Adopting the Code	Demonstrate willingness to collaborate with the Organization to identify and eliminate or mitigate all types of risk, including those involving ethics and labor, environmental, social, and workplace health and safety aspects related to your operations.
2	Sustainable management of the supply chain	Take the necessary actions to promote respect for and the fulfillment of the expectations laid out in this Code in your own value chain.
3	Emergency response	Where applicable because of the activity or service provided to the Organization, the Supplier or Contractor is required to fully comply with the emergency response plans set by Grupo México and/or its subsidiaries at the operations where the product and/or service is delivered.

## ii. Occupational Health & Safety

At Grupo México, the health and safety of our people is paramount. Caring for the health, physical safety and general wellbeing of our personnel, suppliers and contractors is a priority and fundamental in all our activities. Our business partners are expected to respect and promote the guidelines outlined in our [Occupational Health and Safety Policy](#). Workplace safety is everyone's responsibility and is also a condition for hiring.



#	Topic	Expectation
4	Safe working conditions	Operate safe and healthy workplaces that promote the prevention of occupational diseases and injuries, providing workers with appropriate personal protective equipment in good condition.
5	Risk prevention	Identify the potential risks associated with the work performed and have a health and safety management plan in place to eliminate or mitigate these risks.
6	Training	Provide appropriate and sufficient health and safety training to employees, considering the work environment and actions that may be required to minimize the related risks.

#	Topic	Expectation
7	Ethics	Operate ethically and promote honesty, equality and integrity in adherence of the Grupo México Code of Ethics and avoid any practice or conduct that could harm the reputation of the Organization and/or produce a negative impact on the communities that neighbor the operations of Grupo México.
8	Legal compliance	Comply with all laws and regulations applicable.
9	Work against corruption in all its forms <sup>1</sup>	Avoid, prevent, not tolerate, permit or engage in acts of corruption, extortion, malfeasance, bribery (gifts <sup>2</sup> and invitations, sponsorships, donations), trading in influences or fraud during the course of business in adherence of our <a href="#">Anti-Corruption Policy</a> . Our business partners must not have ties with companies or individuals that have been convicted for criminal activities involving corrupt behavior.
10	Money Laundering	Take the necessary measures to avoid engaging in money laundering during the course of business in adherence of our <a href="#">Anti-Money Laundering Policy</a> .
11	Antitrust practices	Comply with antitrust laws and other related regulations in effect in the country where you operate and where you provide products and/or services.
12	Data privacy and intellectual property	Protect and use confidential information appropriately, and also respect all intellectual property rights as established under contract with the Organization and as set by the applicable regulations in each country.
13	Transparency	Promote accountability so that third parties may ascertain and assess the performance and impacts of the company.

<sup>1</sup> Aligned with [Principle #10 of the Global Compact](#)

<sup>2</sup> For more information on the guidelines for acceptable gifts, see the Grupo México Code of Ethics, [p. 22](#)



### iii. Ethics, Integrity and Transparency

We seek to maintain relationships only with business partners that manage their businesses ethically and with integrity and transparency.

#	Topic	Expectation
14	Respect for human rights <sup>3</sup>	Respect and promote the human rights of all employees and collaborators, and not be complicit in human rights violations, in adherence of the guidelines set out in the Grupo México General Human Rights Policy.
15	Violations of international humanitarian law <sup>3</sup>	Not tolerate, practice or support criminal acts of war or other serious violations of international humanitarian law, crimes against humanity or genocide.
16	Human trafficking	Not tolerate, practice or support, directly or indirectly, human trafficking.
17	Supporting non-state armed groups	Not tolerate, practice or support, directly or indirectly, non-state armed groups.
18	Organizations that sponsor terrorism	Not tolerate, practice or support, directly or indirectly, terrorism.
19	Corporate security	Ensure security and surveillance procedures are implemented and applied in accordance with internationally recognized principles on human rights. <sup>4</sup>

<sup>3</sup> Aligned with [Principles #1](#) and [#2](#) of the Global Compact



## iv. Human Rights

At Grupo México, we respect and promote the human rights of all our employees and collaborators, the communities where we operate, and our value chain, in adherence of the United Nations Universal Declaration on Human Rights, the International Labor Organization Declaration and the local laws in the countries where we operate. Our commitments are formalized in our [General Human Rights Policy](#) and include due diligence processes to identify, prevent, mitigate, and as necessary, remediate potentially adverse impacts on human rights at all our operations.

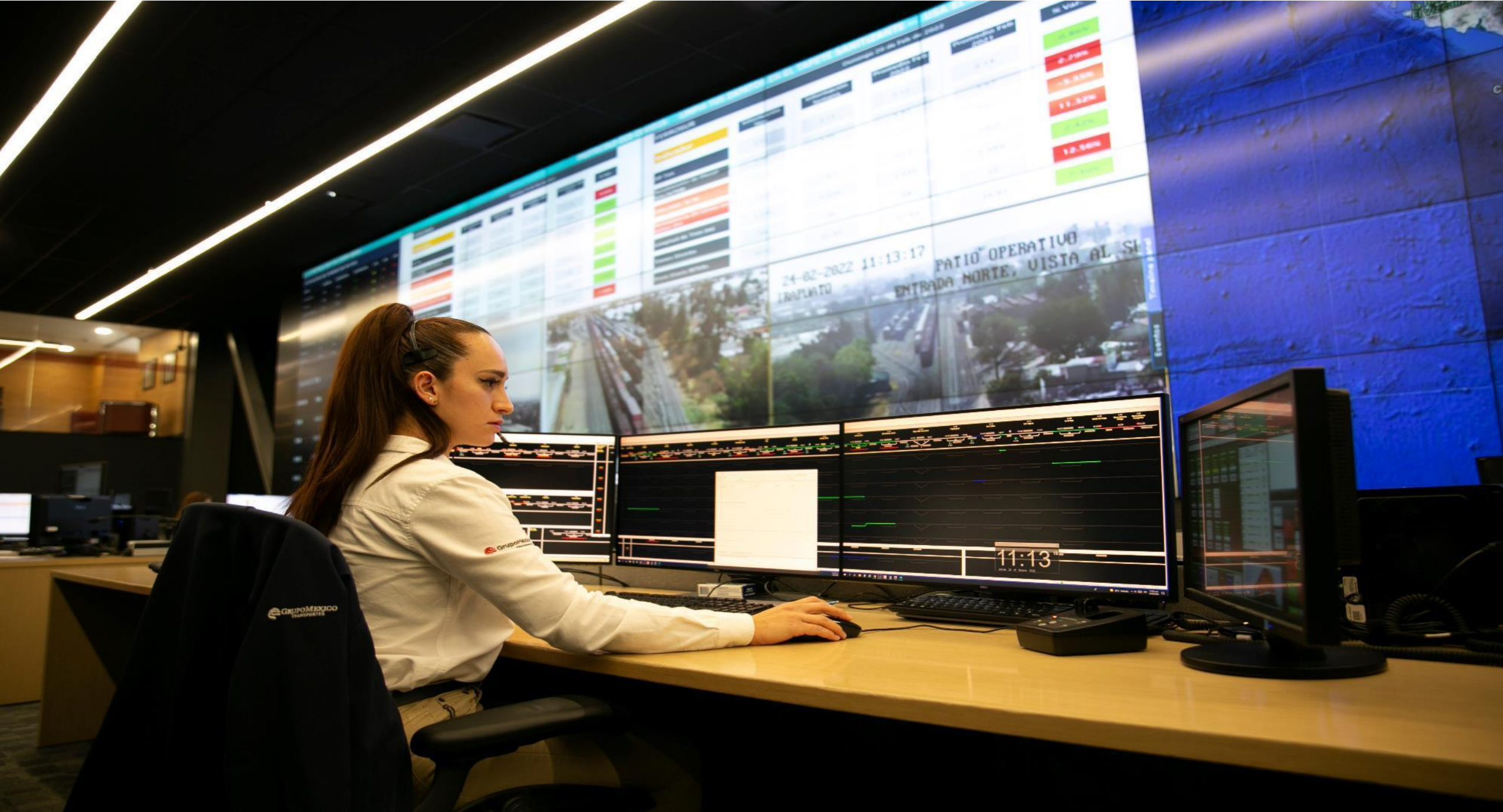
<sup>4</sup> Such as the United Nations International Human Rights Instruments. For more information, see the section References [p.17](#).



# v. Labor Aspects

At Grupo México, we are committed to respecting and promoting the Fundamental Rights at Work in adherence of the laws and regulations in the countries where we operate and the Declaration of the International Labor Organization (ILO)<sup>5</sup>, and to implementing related preventive measures. Our relevant business partners are expected to adopt these same commitments.

<sup>5</sup> Specifically conventions 87, 98 (freedom of association), 29 and 105 (forced labor), 138, 182 (child labor); 111 (harassment and discrimination), and 100 (remuneration and work hours).



#	Topic	Expectation
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20	Decent working conditions	Ensure working conditions are decent and that they comply with all applicable laws and regulations in the country where the activity is conducted and in adherence of applicable international references <sup>10</sup> . Pay salaries at or above the local minimum wage; respect regular employee work hours and overtime, ensuring overtime is voluntary and in accordance with local legislation.
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21	Freedom of association and collective bargaining <sup>6</sup>	Respect and promote freedom of association and effective recognition of the right to collective bargaining.
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22	Forced labor <sup>7</sup>	Eradicate forced labor in all its forms. Not tolerate, participate in or benefit from any form of forced labor.
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23	Child labor <sup>8</sup>	Ensure the effective abolition of child labor. Not tolerate, practice or support the use of child labor.
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24	Harassment and discrimination <sup>9</sup>	Not tolerate, practice or support any form of workplace or sexual harassment or discrimination, and ensure no employee is negatively affected professionally, financially or in their character for reasons not directly related to their work performance. ( <a href="#">Policy on Diversity, Inclusion and Non-Discrimination</a> )
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<sup>6</sup> Aligned with [Principle #3 of the Global Compact](#)

<sup>8</sup> Aligned with [Principle #5 of the Global Compact](#)

<sup>7</sup> Aligned with [Principle #4 of the Global Compact](#)

<sup>9</sup> Aligned with [Principle #6 of the Global Compact](#)

#	Topic	Expectation
25	Alignment with the community development model	Deliver the service in an environment of respect, equity and good faith that supports compliance with the Grupo México <a href="#">Community Development Policy</a> .
26	Culturally appropriate channels of communication	Have culturally appropriate channels of communication in place to receive and address concerns and complaints involving potential impacts on Human Rights, and where necessary, have the capacity to remedy damages caused or incurred. Business Partners are expected to actively participate with the Organization and our Community Care Service <sup>10</sup> to address any incidents that may arise.
27	Foster the economic development of communities	Actively participate in strengthening the skills and competencies of local persons and companies to foster integrating local businesses and enterprises into the value chain and additional services.
28	Interaction with indigenous peoples and communities	Be respectful of indigenous peoples when the service is delivered in these areas and adopt the commitments laid out in Convention 169 of the International Labor Organization and our <a href="#">Policy on Respect for the Human Rights of Indigenous Peoples and Communities</a> .

<sup>10</sup> Community Care Service for the community and their relationship with the company; different from the reporting line, which is to report incidents or violations of the Code of Ethics. Phone 800 999 1498 / sac@csc.gmexico.com



## vi. Community Relations

A priority for Grupo México is to be a good neighbor in the communities where we have operations. Together, businesses and communities, we can support each other in social and economic development on the path to common goals and to achieving the United Nations Sustainable Development Goals. We believe that community development must be based on transparency and trust, building long-lasting relationships that strengthen over time.

#	Topic	Expectation
29	Environmental responsibility <sup>11</sup>	Use natural resources responsibly and with a focus on long term sustainability and a preventive approach.
30	Environmental management	Identify in advance the environmental risks associated with your activities and have an environmental management plan in place to avoid or mitigate these risks. Also, comply with all environmental legal requirements and obligations applicable.
31	Climate change	Estimate the carbon footprint of your organization, take actions to reduce this footprint and provide information on the emissions associated with the products and services supplied to Grupo México, on request.
32	Water	Adopt measures that promote responsible water management, ongoing improvement in water efficiency and management, and respect the rights of others with whom you share this resource.
33	Waste and effluents	Take actions to avoid or minimize producing waste and effluents, and also their impact on the environment. Wherever possible, reintegrate waste and effluents into the production and consumption systems.
34	Biodiversity	Contribute to the protection and conservation of biodiversity, promote zero net deforestation and strive to achieve a positive net impact.



## vii. Environment

By protecting the natural heritage through efficient use of resources, we affirm our commitment to future generations, driving a development that benefits everyone, today and tomorrow. We're committed to the Paris Agreement on climate change, to the ongoing improvement of our environmental performance, and to promoting the adoption of environmental best practices in our operations. We are contributing to the transition to a green economy. We expect our business partners to adopt the commitments laid out in our [Environmental Policy](#).

<sup>11</sup> Aligned with [Principles #7](#) and [#8](#) of the Global Compact.

# viii. Product Characteristics

Our suppliers and contractors are expected to support the development, dissemination and use of environmentally respectful and safe technologies.



#	Topic	Expectation
35	Quality and safety criteria	Ensure the products supplied meet the highest standards of quality and safety for health and the environment, minimizing the use of hazardous substances.
36	Environmental aspects <sup>12</sup>	Implement measures to minimize the environmental impact of your products throughout their lifecycle and promote a circular economy.

<sup>12</sup> Aligned with [Principle #9 of the Global Compact](#)

# Implementation of the Code

Sustainable development is key to the values and commitments that we seek to foster with all our business partners. Therefore ESG (Environmental, Social and Governance) performance is incorporated into our selection and renewal criteria for suppliers and contractors, and the corresponding reviews that Grupo México conducts annually. We also recommend that our suppliers and contractors have codes of conduct or policies in place for their own vendors aligned with this Code.

The Organization reserves the right to give preference to those who demonstrate good ESG performance results and a commitment to ongoing improvement. We invite you to review your ESG performance regularly through recognized international assessments, and to proactively share your results and certifications with us, as appropriate. This is particularly relevant for suppliers and contractors who may be required to periodically participate in an ESG assessment conducted by a third party. Grupo México also uses annual supplier and contractor reviews to identify areas of opportunity in terms of meeting compliance with this Code.

When potential risks of the minimum expectations or requirements outlined in this Code not being met are identified, Grupo México will recommend corrective actions, accordingly, considering the capacities and characteristics of the different types of business partners. Upon learning that a business partner may have engaged in any conduct prohibited under this Code, Grupo México will open an investigation that will be led by a taskforce designated by the Ethics Committee in each division. This investigation may involve non-intrusive visits, audits and verifications (when considered appropriate). The supplier or contractor agrees to fully collaborate with such investigations to confirm their compliance with this Code.

Each division will actively promote and strengthen the principles laid out in this Code with all their business partners, with the understanding that all Grupo México Business Partners and Relevant Business Partners are required to comply with these principles, with the exception of those referenced in items 26, 30, 31, 32, 33 and 36, compliance with which is only mandatory for Relevant Business Partners. However, we hope all Business Partners will reach full compliance with all these principles. Lastly, failure to fulfill the minimum expectations or requirements established in this Code shall provide cause for the termination of the contractual relationship.

# Reporting mechanisms

It is everyone's responsibility to report any violation of this Code via the institutional channels in place for this purpose:

Division	Subsidiary	Phone Line	Email
Mining Division	Mining Division	+52-800-062-2105	<a href="mailto:amc@lineadeintegridad.com">amc@lineadeintegridad.com</a>
	Southern Copper Corporation	+51-08-007-8258	<a href="mailto:scc@lineadeintegridad.com">scc@lineadeintegridad.com</a>
	Southern Perú Copper Corporation		<a href="mailto:spcc@lineadeintegridad.com">spcc@lineadeintegridad.com</a>
	Minera México	+52-800-062-2105	<a href="mailto:mm@lineadeintegridad.com">mm@lineadeintegridad.com</a>
	ASARCO	+1-844-402.0221	<a href="mailto:asarco@lineofintegrity.com">asarco@lineofintegrity.com</a>
	Los Frailes	+34-900 - 423 - 887	<a href="mailto:mineralosfrailes@lineadedenuncia.com">mineralosfrailes@lineadedenuncia.com</a>
Transportation Division		800-062-2105	<a href="mailto:gmxt@lineadeintegridad.com">gmxt@lineadeintegridad.com</a>
Infrastructure Division		800-062-2105	<a href="mailto:gminfra@lineadeintegridad.com">gminfra@lineadeintegridad.com</a>

# Acceptance

We agree to and accept our obligations as laid out in this Code.

**Organization**

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**Date**

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DD / MM / YYYY

**Name and position**

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**Signature**

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## Requirement

By accepting this Code, the business partner commits to meeting compliance with same. This Code must be accepted prior to signing any new contract or renewal with Grupo México.

# Examples of relevant sustainability performance indicators to manage the Grupo México supply chain:

## Ethics and Human Rights

- Do you have a Code of Ethics?
- Do you have mechanisms and procedures in place to ensure regulatory compliance and to prevent improper practices? (e.g. corruption, malfeasance, etc.)
- Do you have a reporting mechanism to address ethical, labor and human rights issues?
- Do you have a human rights due diligence process?
- Do you have a mechanism for addressing, and where necessary, remedying potential impacts on the human rights of communities?

## Labor Aspects, Health & Safety

- Do you provide your employees with a contract written in their first language establishing the terms and conditions for their employment?
- Do you have a mechanism for employees to report labor issues and incidents of harassment?
- Do you systematically identify and mitigate the health and safety risks to which your employees may be exposed?
- Do you monitor and report the number and severity of workplace accidents?
- Are you certified in health and safety?

## Environment, Responsible Product Supply

- Do you systematically identify and mitigate the environmental risks caused by your activities?
- Do you have environmental management certifications?
- Do you publicly report your carbon footprint and your water footprint?
- Do you have targets and programs that promote the ongoing improvement of your environmental performance?

## Social Responsibility and Product Responsibility

- Do you take actions to promote respect for and the development of the communities near your operations?
- Do you participate in sustainable development assessments? (e.g. CDP; CSR Recognition, VigeoEiris, etc.)
- Do you have any certification or recognition for the sustainability of your practices and/or products? (e.g. ISO 14001, ISO 45001, ISO 9001, Dow Jones Sustainability Index, etc.)



# References

Topic	Internal References	External References
General	<ul style="list-style-type: none"> <li>General Sustainable Development Policy   <a href="#">link</a></li> </ul>	<ul style="list-style-type: none"> <li>United Nations Sustainable Development Goals   <a href="#">link</a></li> <li>10 Principles of the Global Compact   <a href="#">link</a></li> <li>Due Diligence Guidance for Responsible Business Conduct – OECD   <a href="#">link</a></li> <li>Performance Standards – International Finance Corporation   <a href="#">link</a></li> <li>Mining Principles – ICMM   <a href="#">link</a></li> <li>Due Diligence Guidance for Responsible Supply Chains of Minerals – OECD   <a href="#">link</a></li> </ul>
Ethics & Integrity	<ul style="list-style-type: none"> <li>Grupo México Code of Ethics   <a href="#">link</a></li> <li>Anti-Corruption Policy   <a href="#">link</a></li> <li>Policy on the Prevention of Money Laundering and Terrorist Financing   <a href="#">link</a></li> <li>Personal Data Protection Policy   <a href="#">link</a></li> </ul>	<ul style="list-style-type: none"> <li>United Nations Convention Against Corruption   <a href="#">link</a></li> <li>Partnering Against Corruption Initiative – World Economic Forum   <a href="#">link</a></li> <li>Business principles for countering bribery – Transparency International   <a href="#">link</a></li> <li>Extractive Industries Transparency Initiative   <a href="#">link</a></li> </ul>
Human Rights	<ul style="list-style-type: none"> <li>General Human Rights Policy   <a href="#">link</a></li> <li>Grupo México Code of Ethics   <a href="#">link</a></li> </ul>	<ul style="list-style-type: none"> <li>Universal Declaration on Human Rights   <a href="#">link</a></li> <li>United Nations International Human Rights Instruments   <a href="#">link</a></li> <li>Voluntary Principles on Security and Human Rights   <a href="#">link</a></li> <li>State sponsors of Terrorism – U.S. Department of State   <a href="#">link</a></li> <li>Foreign Terrorist Organizations – U.S. Department of State   <a href="#">link</a></li> <li>Sanctions List Search – Office of Foreign Assets Control   <a href="#">link</a></li> </ul>
Labor Aspects	<ul style="list-style-type: none"> <li>Grupo México Code of Ethics   <a href="#">link</a></li> <li>General Policy on Diversity, Inclusion and Non-Discrimination   <a href="#">link</a></li> </ul>	<ul style="list-style-type: none"> <li>ILO Declaration on Fundamental Principles and Rights at Work   <a href="#">link</a></li> <li>International Labor Organization Conventions and Recommendations   <a href="#">link</a></li> </ul>
Occupational Health & Safety	<ul style="list-style-type: none"> <li>Occupational Health and Safety Policy   <a href="#">link</a></li> </ul>	<ul style="list-style-type: none"> <li>Report III Statistics of Occupational Injuries – International Labor Organization   <a href="#">link</a></li> <li>ILO Codes of Practice and Guides on Occupational Health   <a href="#">link</a></li> <li>ISO 45001 Occupational Health and Safety Management Systems   <a href="#">link</a></li> <li>OHSAS 18001 Occupational Health and Safety Management Systems   <a href="#">link</a></li> </ul>
Community Relations	<ul style="list-style-type: none"> <li>Policy on Community Relations   <a href="#">link</a></li> <li>General Policy on Respect for the Rights of Indigenous Peoples and Communities   <a href="#">link</a></li> </ul>	<ul style="list-style-type: none"> <li>International Labor Organization Convention 169   <a href="#">link</a></li> <li>Declaration on the Rights of Indigenous Peoples   <a href="#">link</a></li> </ul>
Environment	<ul style="list-style-type: none"> <li>Environmental Policy   <a href="#">link</a></li> </ul>	<ul style="list-style-type: none"> <li>ISO 14001 Environmental Management Systems   <a href="#">link</a></li> <li>CDP Questionnaires   <a href="#">link</a></li> <li>TCFD Recommendations   <a href="#">link</a></li> <li>Greenhouse Gas Protocol   <a href="#">link</a></li> </ul>
Risk Management		<ul style="list-style-type: none"> <li>ISO 31001 Risk Management Systems   <a href="#">link</a></li> </ul>

# Glossary

Term	Definition
<b>Contractor</b>	Third party individual or business that provides services under an authorized, signed and accepted contract or work order.
<b>Organization</b>	The “Organization” refers to Grupo México, S.A.B. (Grupo México), including its Mining, Transportation and Infrastructure divisions (companies and subsidiaries – including Southern Copper Corporation), in all countries where Grupo México has operations.
<b>Supplier</b>	Third party individual or business that supplies goods and/or services under an authorized, signed and accepted contract or work order.
<b>Business partners</b>	Outside party with which Grupo México, and/or its subsidiaries, has or plans to have a commercial or business relationship. A “Business partner” is an organization, business or other type of entity or enterprise with which Grupo México, and/or its subsidiaries, has a direct commercial or business relationship. This relationship may be a contractual agreement to produce, purchase or sell a product. Includes local and international customers, brokers and traders, and the partners or associates of a joint venture. Does not include end consumers.
<b>Relevant business partners</b>	Any partner where it can be reasonably expected that their actions would considerably affect the business of the company, including suppliers with large-volume contracts or which are essential for the continuity of the business, and major customers. Determined from the results of a risk assessment.
<b>Intellectual property</b>	All information and documentation produced, developed and/or conceived by any employee, supplier or service provider during the course of their duties or services while in the employ or under contract with Grupo México, will be considered property of the Organization.
<b>Genocide</b>	As defined in the OECD Model Supply Chain Policy for a Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas.
<b>Human trafficking</b>	As defined in Article 3 of the Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention against Transnational Organized Crime, <a href="#">p. 2</a>
<b>Terrorism</b>	As defined in the OECD Model Supply Chain Policy for a Responsible Global Supply Chain of Minerals from Conflict-Affected and High-Risk Areas.
<b>Forced labor</b>	Per ILO Convention 19: all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered themselves voluntarily.
<b>Child labor</b>	Per the ILO: The term “child labor” is often defined as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. Grupo México defines “child” as any person under 16 years of age or under the minimum age required to complete their formal education, or any person who has not reached the legal minimum age to work in the country in question.
<b>Discrimination</b>	Includes any behavior based on ethnic or regional origin, gender, age, disability, economic status, health, religious beliefs, opinion, sexual preference, union affiliation or marital status.

