
CERRO DE PASCO RESOURCES INC.

CODE OF BUSINESS CONDUCT AND ETHICS

Cerro de Pasco Resources Inc.'s (CDPR) success is built on a commitment to high standards of corporate governance, business conduct, and professional integrity. We conduct our business around the world in an ethical, honest and accountable manner and in accordance with applicable laws, rules and regulations. We value, and are committed to, transparency in our business practices, consistent with good commercial confidentiality.

Our Code of Business Conduct and Ethics, as well as, our Corporate Social Responsibility (CSR) Policy and other associated policies, embodies the commitments of our company and guide our efforts. This Code and its component policies have been adopted by our company's Board of Directors and these apply to every company employee, including the Chief Executive Officer and other senior executive and financial officers, and to members of our Board of Directors.

In addition to this Code (and all of its component policies), every employee and director must also read and comply with all other company policies, which include our: Corporate Social Responsibility (CSR) Policy; Environmental Policy; Social/Community Policy; and, Safety & Health Policy.

All of our company employees are accountable for adhering to this Code and the highest ethical standards. Each employee is responsible for reporting behavior that violates this Code. Failure to observe this Code may subject employees to disciplinary action by our company, up to and including termination. Furthermore, violations of this Code could possibly also be violations of the law and may result in civil or criminal penalties for employees, supervisors, managers, executives, and/or our company.

The CDPR Corporate Code of Business Conduct and Ethics outlines our obligations regarding: business integrity, labor practices, security, human rights, transparency, public disclosure, cultural heritage, avoiding conflicts of interest, avoiding insider trading, anti-fraud, and anti- corruption & anti-bribery, among others.

Employees can anonymously report Code violations or express concerns and ask questions about ethical issues through our confidential Compliance Hotline, available to all employees, even from remote locations, and in the language of their choice.

The CDPR Code of Business Conduct and Ethics is comprised of 18 separate policies that are listed below:

1. [Business Integrity Policy](#)
2. [Labor and Employment Policy](#) (including child labor; non-slavery & human trafficking; non-discrimination; gender equality; sexual & other harassment; diversity & inclusion; and, other aspects)
3. [Security Policy](#)
4. [Human Rights Policy](#)
5. [Transparency Policy](#)
6. [Public Disclosure Policy](#)
7. [Cultural Heritage Policy](#)
8. [Avoiding Conflicts of Interest Policy](#)
9. [Avoiding Insider Trading Policy](#)
10. [Anti-Fraud Policy](#)
11. [Respectful Workplace Policy](#)
12. [Drug-free and Alcohol-free Policy](#)
13. [Employee Privacy Policy](#)
14. [Fair Dealing Policy](#)
15. [Policy on Protecting Confidential Information and Intellectual Property](#)
16. [Policy on Protecting Company Assets](#)
17. [Security Policy - Financial](#)
18. [Security Policy - Cyber](#)

1. BUSINESS INTEGRITY POLICY

Cerro de Pasco Resources Inc. is fully committed to working with integrity, which means – doing what is right and doing what we say we will do. This should be the starting point for everything we do. We care as much about how results are achieved as we do about the results themselves.

We believe that compliance with laws and regulatory requirements is a fundamental tenet for our company and our operations. Our company is committed to the principles of *Responsible Mining*. And, we are committed to respect for people and human rights in all of our endeavors.

Operating responsibly and ethically involves bringing the values of our Corporate Code of Business Conduct and Ethics to life. We deliver on our commitments to our shareholders, employees, and host communities by demonstrating these values through our actions, processes, systems and interactions with all stakeholders.

Behavior that consistently demonstrates the values in our Code cultivates loyalty and trust with each other and our stakeholders. That’s why we have our Code. It guides our daily work and helps us think about not just what we do, but how we do it. It demonstrates how to practically apply the values of the Code; and, reflects the essence of all of our company’s policy commitments, as well as, our conformance with local and national standards, applicable laws and regulations, and generally-accepted international standards of performance.

Operating with integrity, respect and accountability is everyone’s responsibility. Each component of our Code explains these principles, our expectations of our workforce, and others who work with us.

2. LABOR AND EMPLOYMENT POLICY

This Policy encompasses all of our Company's labor & employment practices, including: child labor; non-slavery & human trafficking; non-discrimination; gender equality; sexual & other harassment; and, diversity & inclusion, among others.

Cerro de Pasco Resources Inc. has a fundamental commitment to respecting labor rights, which is expressed through our compliance with relevant laws and regulations, as well as, conformance with generally-accepted international standards of labor practices and performance. We are committed to labor rights that cover the right to freedom of association and collective bargaining; and, the right to equal remuneration for equal work.

We foster a work environment in which all individuals are treated with respect. We are committed to actions and policies to assure fair employment and will not tolerate discrimination.

We have a zero-tolerance approach to forced or compulsory labor, child labor, unfair discrimination, and any form of slavery or human trafficking.

We believe that all of our employees have a right to work in an environment that is free from violence or harassment. We do not tolerate violence, harassment, or bullying in any form.

We are committed to maintaining a safe and healthy work environment free of substance abuse. Our personnel are expected to perform their responsibilities in a professional manner and, to the degree that job performance or judgment may be hindered, be free from the effects of drugs and/or alcohol.

Non-Discrimination

Cerro de Pasco Resources Inc. will always employ, develop and promote based on merit and we do not tolerate any form of unlawful discrimination. Unlawful discrimination against a person based on personal attributes unrelated to job performance, such as race, gender identity, sexual orientation, intersex status, physical or mental disability, relationship status, religion, political opinion, pregnancy, breastfeeding, or family responsibilities is prohibited.

All existing and prospective employees will be treated fairly and evaluated according to their skills, qualifications, and capabilities. Personal relationships must not impact who we employ or reward. Our systems, processes and practices support fair treatment.

Sexual & Other Harassment

Cerro de Pasco Resources Inc. values our employees and treats them with dignity, care and respect. We do not tolerate harassment or bullying in any form. This includes any action that can be considered as

offensive or intimidating. We all have a right to work in an environment that is free from violence or harassment.

Harassment is an action or behavior that is viewed as unwelcome, humiliating, intimidating or offensive by the recipient. Sexual harassment may include unwelcome touching, suggestive comments or jokes, insults of a sexual nature, sending sexually explicit emails or messages. The impact of the action or behavior on the recipient, not just the intent, is considered when determining whether the action or behavior is harassment.

Bullying is repeated verbal, physical, social or psychological abuse of a worker by a person or group of people at work. The workplace must be free from violent behavior. Threatening, intimidating, or aggressive behavior, as well as bullying, subjecting to ridicule or other similar behavior toward fellow employees or others in the workplace, will not be tolerated.

We embrace the following guidelines:

Always.....

- Treat everyone with dignity, care and respect.
- Treat others as you expect to be treated yourself.
- Have the courage to speak up about any harassment or bullying at work that you might experience or see.

Never.....

- Discriminate or harass against anyone because of their age, gender, race, culture, religion, marital status, sexual orientation, and physical or mental ability.
- Disseminate or display materials that can reasonably be expected to cause offence because of their treatment of the above issues; for example, sexually explicit images.
- Behave in a way that is intimidating or humiliating to others.
- Distribute or display offensive, threatening or demeaning materials.

Diversity & Inclusion

Diversity is the presence of difference within a given setting, in this case a workplace. The setting and the differences typically refer to identity, like race and gender, and sometimes ethnicity, religion, nationality, or sexual orientation. Inclusion has to do with people with different identities feeling and/or being valued, leveraged, and welcomed within a given setting.

A diverse, inclusive, and equitable workplace is one where all employees, whatever their gender, race, ethnicity, national origin, age, sexual orientation or identity, education or disability, feels valued and respected. Cerro de Pasco Resources Inc. is committed to a nondiscriminatory approach and provides

equal opportunity for employment and advancement in all of our departments, programs, and worksites. We respect and value diverse life experiences and heritages and ensure that all voices are valued and heard.

3. SECURITY POLICY

Respect for employees and people in local communities is a key consideration in Cerro de Pasco Resources Inc.'s security plans and a fundamental component of our Responsible Mining approach. Our company recognizes the need for an effective security program to protect people, products, assets and reputation. The protection of people is first and foremost. The company produces valuable mineral products and other commodities; and, its operational sites house valuable plant, equipment, vehicles, commodities and materials that must be safeguarded

Our company may conduct exploration activities and may operate natural resource projects in various countries around the world. While the security challenges may vary by location, our company's Security Policy applies to all locations worldwide.

Security is an important factor in the future growth and development of the company. Maintaining an effective security function is critical to the protection of our company, as well as, our people, products, assets and reputation. We will strive to provide the security expertise and resources required to develop a safe and secure working environment for our employees; and, to establish security strategies, plans, standards, policies and procedures to support achievement of our company's business objectives.

We endeavor to maintain a high degree of professionalism, knowledge and integrity among security staff with appropriate recruiting, training, resources, and contracting procedures. And, as a result, we will treat all people with respect and dignity and will be guided in our approaches and actions by the *Voluntary Principles on Security and Human Rights*.

Our goal is to identify and manage risks effectively, with a focus on preventing security incidents; and, to be prepared to respond to incidents with appropriate and tested response plans. We have established programs that protect employees, company assets and shareholders from loss from theft, fraud, and other inappropriate activity. We will investigate and analyze security incidents and take appropriate action. We aim to continuously improve in all aspects of our security operations for the company.

Our company follows the *Voluntary Principles on Security and Human Rights*, a set of internationally-recognized principles that are used to guide companies in maintaining the safety and security of their operations within an operating framework that ensures respect for human rights and fundamental freedoms. The *Voluntary Principles* were developed by a group of governments, businesses, and non-governmental organizations for use by companies in the extractive and energy sectors. *The Voluntary Principles* incorporate the *United Nations Universal Declaration of Human Rights*, which states that *the inherent dignity and the equal and inalienable rights of all members of the human family is the foundation of freedom, justice and peace in the world. Everyone is entitled to all the rights and freedoms set forth in the Declaration, without distinction of any kind, such as race, color, sex, language, religion, political or other opinion, national or social origin, property, birth or other status.*

4. HUMAN RIGHTS POLICY

Cerro de Pasco Resources Inc. does not tolerate human rights violations. Our company follows the *Voluntary Principles on Security and Human Rights* — a set of internationally-recognized guidelines by which companies in the extractive sector can maintain the safety and security of their operations while ensuring respect for human rights and fundamental freedoms.

Our company is dedicated to recognizing and respecting human rights wherever we do business. Our company's Corporate Social Responsibility Policy also affirms our commitment to observe the fundamental tenets of human rights. This commitment is embedded in our corporate culture and is aligned with the principles in the *United Nations Universal Declaration of Human Rights*. All our employees are to be treated with respect and dignity, and abide by our Code of Business Conduct and Ethics.

We are committed to providing equal opportunity and freedom from discrimination for all our employees and contractors, to uphold the elimination of all forms of forced and compulsory labor, and to support the effective abolition of child labor. Our commitment to these rights is affirmed by our endorsement of the *Ten Principles* of the U.N. *Global Compact* (shown in full below). This initiative promotes corporate citizenship by directly involving businesses in tackling some of the major social and environmental challenges that arise from increasing globalization. These *Ten Principles* are based on internationally recognized norms and conventions in four critical areas: Human Rights, Labor Standards, the Environment, and Anti-corruption. By endorsing the concept of the U.N. *Global Compact*, our company clearly signals its commitment to the integration of the *Ten Principles* into its culture, strategy, and day-to-day operations.

Cerro de Pasco Resources Inc. is committed to conducting business in accordance with generally-accepted, international principles of sustainable development. Such principles include a commitment to “uphold fundamental human rights and respect for culture, customs, and values in dealing with employees and others who are affected by our activities.” As part of this commitment, our company will:

- Ensure that appropriate policies and procedures are instituted and implemented to ensure that human rights are being fully respected;
- Promote human rights through engagement with host governments, local communities, civil society, and our employees and contractors;
- Engage with local stakeholders to understand the local context and determine the most effective means of promoting human rights and respecting local communities, and assess the impact of operations on social factors, including human rights;
- Support the investigation and appropriate remediation of human rights violations;
- Ensure that grievance mechanisms are in place at all sites to allow effective reporting of human rights concerns, and protect all employees who timely report suspected human rights violations;
- Provide culturally appropriate human rights education, training, and guidance to all relevant staff; and,
- Implement proactive human rights programs when operating in challenging areas with high social and political risks.

While the primary responsibility for human rights lies with local and national governments, we are committed to working with and helping host governments avoid human rights violations. That includes a responsibility to promote human rights by contributing to public debate, supporting international agreements and commitments, identifying opportunities to constructively engage government on human rights issues relevant to our business in the host country, and helping to ensure the existence of appropriate systems to ensure that victims of human rights abuses have access to reasonable remedies.

U.N. Global Compact Ten Principles [<https://www.unglobalcompact.org/what-is-gc/mission/principles>]

The Ten Principles of the United Nations Global Compact are derived from: the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

5. TRANSPARENCY POLICY

Cerro de Pasco Resources Inc. supports improved business conduct through the full publication and verification of government revenues generated by mining. We pay taxes and royalties and report this information in our Annual Financial Report. We do not receive financial assistance from governments. We endorse the *Principles of the Extractive Industries Transparency Initiative (EITI)*. [shown in full below]

The EITI is a coalition of governments, companies, civil society groups, investors and international organizations that promotes a globally developed standard of local-level revenue transparency and accountability in the extractives sector. The EITI supports improved governance in resource-rich countries through the verification and full publication of company payments and government revenues from the extractives sector.

Mining is a heavily regulated industry. Our company maintains a continuous dialogue with governments and regulators at all levels regarding regulatory issues and other items of business interest. Our company belongs to industry associations and also works closely with international and non-government organizations regarding appropriate standards and guidelines for our industry.

The EITI Principles [<https://eiti.org/document/eiti-principles>]

BOX 1 THE EITI PRINCIPLES

- 1 We share a belief that the prudent use of natural resource wealth should be an important engine for sustainable economic growth that contributes to sustainable development and poverty reduction, but if not managed properly, can create negative economic and social impacts.
- 2 We affirm that management of natural resource wealth for the benefit of a country's citizens is in the domain of sovereign governments to be exercised in the interests of their national development.
- 3 We recognise that the benefits of resource extraction occur as revenue streams over many years and can be highly price dependent.
- 4 We recognise that a public understanding of government revenues and expenditure over time could help public debate and inform choice of appropriate and realistic options for sustainable development.
- 5 We underline the importance of transparency by governments and companies in the extractive industries and the need to enhance public financial management and accountability.
- 6 We recognise that achievement of greater transparency must be set in the context of respect for contracts and laws.
- 7 We recognise the enhanced environment for domestic and foreign direct investment that financial transparency may bring.
- 8 We believe in the principle and practice of accountability by government to all citizens for the stewardship of revenue streams and public expenditure.
- 9 We are committed to encouraging high standards of transparency and accountability in public life, government operations and in business.
- 10 We believe that a broadly consistent and workable approach to the disclosure of payments and revenues is required, which is simple to undertake and to use.
- 11 We believe that payments' disclosure in a given country should involve all extractive industry companies operating in that country.
- 12 In seeking solutions, we believe that all stakeholders have important and relevant contributions to make – including governments and their agencies, extractive industry companies, service companies, multilateral organisations, financial organisations, investors and non-governmental organisations.

6. PUBLIC DISCLOSURE POLICY

Cerro de Pasco Resources Inc. needs to be truthful in all our reporting to make sure that we maintain the trust of our stakeholders and our “social license” to operate. All data that we create and maintain must accurately reflect the underlying transactions and events. There is never a justification for falsifying records, misrepresenting facts or engaging in any other fraudulent behavior.

All financial transactions must be evidenced by appropriate source documents, verified for their validity and accuracy, properly authorized, and accurately and completely recorded in the relevant accounts, systems and records. This includes, but is not limited to, bid and tender evaluation records, purchase orders, maintenance reports, receiving documents, invoices, travel and expense records, journal entries, timesheets and tax filings.

If you are responsible for reporting information, whether financial or non-financial, you must make sure that there are adequate internal controls to achieve truthful, accurate, complete, consistent, timely and understandable reports. You should only report accurate data and information regarding CDPR’s business activities.

You need to understand and comply with all applicable financial, regulatory and other applicable reporting requirements, laws and regulations in the relevant jurisdiction. If you have any concerns about the validity of any reporting process or record-keeping activity, or believe you are being asked to create false or misleading information, you must report it immediately.

7. CULTURAL HERITAGE POLICY

Cultural Heritage is an expression of the ways of living developed by a community and passed on from generation to generation, including customs, practices, places, objects, artistic expressions and values. The cultural heritage significance of a place, or feature of a place, includes its aesthetic, architectural, historical, scientific, social, or other significance, to the present generation or past or future generations.

Cultural heritage includes tangible culture (such as buildings, monuments, landscapes, books, works of art, and artifacts), intangible culture (such as folklore, traditions, language, and knowledge), and natural heritage (including culturally significant landscapes and biodiversity).

As also stated in the Cerro de Pasco Resources Inc. Social & Community Policy, our company values cultural heritage; respects the traditional rights of indigenous peoples; and, acknowledges and accommodates cultural differences, preferences and lifestyles.

We also strive to follow the tenets of the *World Bank/IFC's Performance Standard 8* regarding Cultural Heritage, which are:

- To protect cultural heritage from the adverse impacts of project activities and support its preservation
- To promote the equitable sharing of benefits from the use of cultural heritage.

8. AVOIDING CONFLICTS OF INTEREST POLICY

In line with our commitment to integrity, we must always be able to demonstrate that all decisions have been made in the best interests of Cerro de Pasco Resources, Inc. and, that they are free from personal bias. This means that we need to manage any actual, perceived or potential conflicts of interest.

Our employees, contractors and consultants must avoid actual or perceived conflicts of interest involving themselves, close relatives or associates. Where a conflict could arise, you must draw this to the attention of your line manager or our Human Resources Department.

A conflict of interest arises when an employee's position within the Company and their financial, or other personal interests affect, could affect, or have the appearance of affecting, their judgement, objectivity or independence. Actual conflicts of interest must be avoided, but even the perception of a conflict of interest can be damaging to the company and must be disclosed and discussed as early as possible.

There are many ways that conflicts of interest could arise. For example, you have a conflict if you:

- are pursuing, awarding or maintaining CDPR business opportunities for personal gain or the benefit of close relatives or friends
- are a board member of another organization outside of your position in our company
- have a material interest in a private company which is related to your work
- have another job outside of our company
- holding investments directly or indirectly in businesses or assets that are contracted to do business for or on behalf of CDPR
- receiving money, property, services or other forms of financial personal benefits from suppliers or other third parties doing, or proposing to do, business with CDPR
- have an intimate relationship with another employee at work who can influence your salary, rating or promotion
- have an intimate relationship with a representative of a business partner or competitor of our company.

Gifts, hospitality or entertainment should only be accepted if they are occasional and of modest value. Determining what is 'occasional and modest' is a matter of judgement.

Nothing you do, professionally or privately, should conflict with your responsibilities to Cerro de Pasco Resources, Inc., compromise the quality of your work performance or jeopardize your ability to make impartial business decisions in the Company's best interest as outlined in our Code of Governance.

9. AVOIDING INSIDER TRADING POLICY

Cerro de Pasco Resources Inc. must never jeopardize the trust of communities, customers, suppliers or coworkers by using confidential information for financial or personal benefit.

It is illegal to deal in Cerro de Pasco Resources, Inc. or third-party securities or shares on the basis of inside information, or to encourage others to do so. Some employees may become aware of information about our company that is confidential and that could influence anyone contemplating investing in Cerro de Pasco Resources, Inc. shares or securities.

Employees are forbidden from using Cerro de Pasco Resources, Inc. confidential or inside information (i.e., information which is not publicly disclosed, is precise, and which is likely to have a significant impact on the price of the share when made available) for personal advantage. Employees are also prohibited from sharing confidential or inside information with others for the same purpose.

Examples of possible inside information include:

- the financial performance of our company against market expectations
- entry into or termination of a significant contract
- actual or proposed mergers, acquisitions or joint ventures
- actual or possible discoveries of, or significant adjustments to, ore bodies or other mineral reserves

We protect our organization and our shareholders through responsibly managing confidential information. Confidential information includes technical information about products or processes, vendor lists, pricing, marketing or service strategies, as well as non-public financial reports and information about mergers, asset sales or acquisitions.

In the course of your job you may learn confidential information before it is made public, and it's not an offence to possess inside information. But in many countries, it is a criminal offence to buy, sell or otherwise deal in relevant securities while you have inside information. This is called insider trading. It is also a criminal offence to encourage insider dealing or to disclose inside information with a view to others profiting from it.

If you possess inside information, you should not advise or encourage another person (for example, a relative, a friend or family company or trust) to buy, sell or otherwise deal in the relevant securities or pass the information to another person. It may also be a breach of your obligations of confidentiality to disclose information, whether or not the information is used to deal in the relevant company's securities,

If you have been placed on a Securities Dealing Restricted List or you are a Person Discharging Managerial Responsibilities, per generally-accepted financial standards, then you need to gain approval from a designated officer within our company before engaging in any transactions involving Cerro de Pasco Resources, Inc. securities. If you have been placed on an Insider List, then you must not deal, or encourage others to deal in Cerro de Pasco Resources, Inc. securities.

If you are an employee participating in any employee share scheme, you must not buy, sell or otherwise deal in Cerro de Pasco Resources, Inc. securities during any closed period, regardless of whether you hold inside information.

Where Cerro de Pasco Resources, Inc. has a business relationship with another company, you should be careful if you trade in that company's shares, as the same insider dealing rules apply to all shares. These types of investments may also give rise to an actual or perceived conflict of interest.

10. ANTI-FRAUD POLICY

Cerro de Pasco Resources, Inc. has a commitment to high legal, ethical and moral standards. All members of the company are expected to share this commitment. This policy is established to facilitate the development of procedures that will aid in the investigation of fraud and related offences.

The Board of Directors of our company already have procedures in place that reduce the likelihood of fraud occurring. These include standing orders, documented procedures, and documented systems of internal control and risk assessment. In addition, the Board tries to ensure that a risk (and fraud) awareness culture exists in this organization.

This policy is intended to provide direction and help to those officers and directors who find themselves having to deal with suspected cases of theft, fraud, or corruption. These documents give a framework for a response and advice and information on various aspects and implications of an investigation. These documents are not intended to provide direction on prevention of fraud.

This policy applies to any fiscal irregularity, or suspected irregularity, involving employees as well as consultants, vendors, contractors, and/or any other parties that have a business relationship with this organization. Any investigative activity required will be conducted without regard to any person's relationship to this organization, position, or length of service.

The term fiscal irregularities refer to, but are not limited to:

- Any dishonest or fraudulent act
- Misappropriation of funds, securities, supplies, or other assets
- Impropriety in the handling or reporting of money or financial transactions
- Profiteering as a result of insider knowledge of company activities
- Disclosing confidential and proprietary information to outside parties
- Disclosing to other persons securities activities engaged in or contemplated by the company
- Accepting or seeking anything of material value from contractors, vendors, or persons providing services/materials to the Company (unless excepted by other company policies)
- Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment
- Any similar or related irregularity

Actions constituting fraud are comprised of both the use of deception to obtain an unjust or illegal financial advantage and intentional misrepresentations affecting the financial statements by one or more individuals among management, staff or third parties.

The Board is absolutely committed to maintaining an honest, open and well-intentioned atmosphere within the organization. It is, therefore, also committed to the elimination of any fraud within the organization, and to the rigorous investigation of any such cases. The Board wishes to encourage anyone having reasonable suspicions of fraud to report to them. Therefore, it is also the Board's

policy, which will be rigorously enforced, that no employee will suffer in any way as a result of reporting reasonably held suspicions.

11. RESPECTFUL WORKPLACE POLICY

Every employee is entitled to work in an environment that is respectful and free of all forms of harassment, including sexual harassment and bullying. We believe that a good work environment is one in which all individuals are treated with respect. We are committed to actions and policies to assure fair employment workplaces and will not tolerate discrimination.

A respectful workplace requires the cooperation and support of each and every employee. Employees must set a positive example and avoid behaving disrespectfully, including behavior that would reasonably offend, intimidate, embarrass or humiliate others, whether deliberately or unintentionally. Disrespectful behavior, sexual harassment, harassment, bullying, and/or violence in any form will not be tolerated.

All employees are responsible for:

- displaying courtesy and respect in words, deeds and actions towards all employees and in all dealings with the public
- not engaging in abusive, inappropriately loud, combative, aggressive, threatening language or behavior
- expressing disagreements with supervisors or peers in an appropriate manner and without the use of offensive, abusive or disrespectful language or actions
- recognizing when they or others are being subjected to disrespectful behavior
- addressing the behavior directly with the person engaging in the disrespectful behavior
- bringing the situation to the attention of a supervisor or the next person in the chain of command or Human Resources for prompt resolution
- making a complaint.

In addition to their personal responsibilities as employees, supervisors are responsible for:

- providing constructive criticism, intended to instruct or clarify and never practicing destructive criticism, intended to demean or cause harm
- encouraging the reporting of instances of disrespectful behavior
- immediately addressing all disrespectful behavior once reported or observed
- taking the situation seriously and promptly investigating the extent and nature of the problem

Any employee who experiences or witness's behavior in violation of this policy is encouraged to address it using the process outlined in this policy. More serious forms of inappropriate behavior (e.g., sexual harassment, harassment/bullying and/or workplace violence) should be reported immediately to an appropriate reporting contact.

Employees are not required to make a formal complaint. However, supervisors are obligated to address an issue they have been made aware of, if necessary, to maintain a harassment-free workplace for all employees. If a supervisor observes or is advised of more serious forms of inappropriate behavior (e.g.,

sexual harassment, harassment/bullying and/or workplace violence), they must not wait until a formal complaint is made to address it; rather, they have a responsibility to address it immediately. This pertains to concerns involving another supervisor, another supervisor's staff, a contractor, a client, or the public.

This policy is not intended to discourage or prevent an employee from exercising any legal right, including filing a complaint with legal authorities, reporting unsafe working conditions through government agencies, or contacting other appropriate authorities. Nothing in this policy precludes an employee from also filing a grievance in accordance with any applicable collective labor agreement.

This policy does not limit the employer's right to manage. Performance reviews, work assignment and evaluation, and disciplinary measures taken by the employer for any valid reason do not constitute disrespectful behavior, sexual harassment, harassment and/or bullying.

This policy applies to all employees and their interactions with other employees, contractors, or members of the public. This policy applies to the workplace itself, as well as activities connected with the workplace (e.g., travel, conferences, online, work related social gatherings, etc.).

It is recognized that employee interactions can occur outside of the workplace and/or outside of working hours. The policy applies to inappropriate off-duty conduct that: reflects negatively on the company or the employee's department; affects the employee's ability to perform their work duties effectively; makes other employees reluctant to work with them; or, restricts the work unit's ability to meet operational requirements

Behavioral Definitions

The following definitions describe a spectrum of behaviors that vary in severity. A list of definitions for other procedural terms used throughout this policy can be found here. Behavior can be deemed inappropriate even if an employee did not intend it to be.

Respectful Behavior: This behavior values diversity, inclusion, dignity, courteous conduct, mutual respect, fairness, equality, and promotes positive communication and collaborative working relationships.

In order to promote and sustain a workplace where all employees are treated with respect and dignity, regardless of their status or position, each employee is expected to abide by the following values and standards of respectful interpersonal behavior, communication and professionalism:

- have an open and cooperative approach in dealings with employees, recognizing and embracing individual differences
- abide by applicable rules, regulations, policies and bylaws and address any dissatisfaction with, or violation of, policies and procedures through appropriate channels
- work honestly, effectively and collegially with employees and others and value the contributions of all employees

- respond promptly, courteously, and appropriately to requests from others for assistance or information
- use conflict management skills, together with respectful and courteous verbal communication, to effectively manage disagreements among employees
- recognize that differing social and cultural standards may mean that behavior that is acceptable to some may be perceived as unacceptable or unreasonable to others
- demonstrate commitment to a culture where all employees cooperate and collaborate within and across departments to achieve high work-related outcomes
- model civility for subordinates and clearly define expectations for how employees treat each other, and are responsive to complaints when they are brought forward.

Disrespectful Behavior: This behavior is disruptive to positive communication, courteous conduct and collaborative working relationships (e.g., gossip, interruptions). Behavior may also be disrespectful if it does not value diversity, inclusion, dignity, fairness and equality. More objectionable and severe forms of disrespectful behavior are considered harassment and/or bullying.

Disrespectful behavior may or may not be intentional. Unintentional disrespectful behavior may still violate this policy. Examples of disrespectful behavior include but are not limited to:

- making comments or engaging in behavior that is untruthful or directed as a personal attack on the professional conduct of others
- engaging in any pattern of disruptive behavior or interaction that could interfere with the workplace or adversely impact the quality of services or products of the company
- demonstrating aggressive behaviors including shouting, abusive language, threats of violence, the use of obscenities or other non-verbal expressions of aggression
- deliberately destroying, damaging or obstructing someone's work performance, work product, tools, or materials or deliberately damaging/destroying any company or employee property
- using this policy and procedure to make knowingly false complaints
- throwing instruments, tools, office equipment, or other items as an expression of anger, criticism, or threat, or in an otherwise disrespectful or abusive manner
- displaying any other behavior that a reasonable person would find to be demeaning or humiliating.

Inappropriate Behavior: This is an overarching term used to describe disrespectful behavior, sexual harassment, harassment, bullying and/or workplace violence. Inappropriate behavior is comprised of acts that:

- create a hostile, threatening, or coercive work environment
- are demeaning, belittling, or can cause personal humiliation or embarrassment
- are threatening, intimidating and generally produce harmful results such as endangering a person's safety or negatively affecting their work performance or employment relationship

- include displaying or distributing inappropriate posters, pictures, cartoons, graffiti, drawings, or other visual representations
- are offensive or insulting including comments, jokes, slurs, name calling, gestures, innuendoes, threats or taunting
- include yelling, use of profanity, making condescending or crude remarks at a person or persons
- include ostracizing or spreading gossip and spiteful rumors about a person or persons
- use coercion or intimidation tactics when managing and monitoring a person's work.

Bullying: See Harassment definition.

Harassment: Harassment is an action or behavior that is viewed as unwelcome, humiliating, intimidating or offensive by the recipient. The impact of the action or behavior on the recipient, not just the intent, is considered when determining whether the action or behavior is harassment.

Sexual Harassment: Means any offensive or humiliating behavior on the grounds of gender. Sexual harassment may include unwelcome touching, suggestive comments or jokes, insults of a sexual nature, sending sexually explicit emails or messages, and demands for sexual favors in exchange for rewards or favorable consequences. Generally, sexual harassment is deliberate, unsolicited, and one sided. Anyone can be a victim or a perpetrator of sexual harassment. The defining characteristic of sexual harassment is that the conduct associated with it is unwelcome or unwanted. Examples of sexual harassment include, but are not limited to, the following:

- unwelcome sexual attention, advances or propositions, including sexually explicit or implicit comments about a person's body, attire or personal life
- an implied or expressed promise of reward for complying with a sexually oriented request, or threat of reprisal or actual reprisal for refusing to comply with such a request
- displays and distribution of sexually suggestive photographs or materials in the workplace, especially those that cause insecurity, discomfort or humiliation or are considered to be offensive
- unwanted physical contact such as touching, patting, kissing or unnecessary closeness
- sexual jokes or obscene remarks or gestures that cause awkwardness or embarrassment

This policy defines two different forms of harassment:

1) *Objectionable conduct* is conduct that creates a risk to the health of a worker. Conduct is objectionable if it is based on race, creed, religion, color, sex, sexual orientation, gender-determined characteristics, marital status, family status, source of income, political belief, political association, political activity, disability, physical size or weight, age, nationality, ancestry or place of origin; and,

2) *Bullying behavior* is repeated verbal, physical, social or psychological abuse of a worker by a person or group of people at work. The workplace must be free from violent behavior. Threatening, intimidating, or aggressive behavior, as well as bullying, subjecting to ridicule or other similar behavior toward fellow employees or others in the workplace, will not be tolerated. Bullying includes severe conduct that

adversely affects a person's psychological or physical well-being. Conduct is considered severe if it is: repeated humiliation or intimidation that adversely affects a person's psychological or physical well-being; or a single instance so serious that it has a lasting, harmful effect on a person.

Workplace Violence: Workplace violence is the threatened, attempted, or actual conduct of a person that causes or may cause physical injury or a fatality in the workplace. Examples of violence can include, but are not limited to:

- physical attacks such as hitting, shoving, pushing or kicking
- verbal, written, or implied threats that express an intent to inflict harm
- threatening behaviors such as shaking fists, destroying property or throwing objects
- acts of domestic violence that evolve into the workplace
- any other act that would arouse fear in a reasonable person in the same circumstances

Summary

At Cerro de Pasco Resources Inc., we embrace the following guidelines:

All employees should always:

- Treat everyone with dignity, care and respect.
- Treat others as you expect to be treated yourself.
- Have the courage to speak up about any harassment or bullying at work that you might experience or see.

And should never:

- Discriminate or harass against anyone because of their age, gender, race, culture, religion, marital status, sexual orientation, and physical or mental ability.
- Disseminate or display materials that can reasonably be expected to cause offense because of their treatment of the above issues; for example, sexually explicit images.
- Behave in a way that is intimidating or humiliating to others.
- Distribute or display offensive, threatening or demeaning materials.

12. DRUG-FREE AND ALCOHOL-FREE POLICY

Cerro de Pasco Resources Inc. (CDPR) recognizes the inherent risks associated with drug use, alcohol abuse, and abuse or misuse of other substances. This policy is designed to eliminate these risks from workplaces and their surrounding environments.

The policy applies to all direct employees, agency and sub-contract employees whilst at their workplace and visitors to company premises or workplaces.

Basic Requirements

The essential requirements of the policy are that:

- CDPR has a 'zero tolerance' to illegal drugs and alcohol in the workplace. Employees are not permitted to work while under the influence of drugs or alcohol. The Company explicitly prohibits the presence of any detectable amount of prohibited substances in the employee's system while at work, while on the premises of the company or its business associates, or while on company business. "Prohibited substances" include illegal drugs, alcohol, or prescription drugs not taken in accordance with a prescription given to the employee.
- Employees must always be in a fit state to carry out their duties when at work. They must not possess, consume or be under the influence of alcohol or other impairing substances.
- Anyone suspected of being impaired due to alcohol or substance abuse or taking of drugs, legal or illegal, must immediately be removed from the workplace.
- CDPR will carry out screening for alcohol and drugs. Testing may be carried out on reasonable suspicion or following an accident or incident. The Company also reserves the right to introduce random testing where it is considered appropriate.
- CDPR explicitly prohibits being impaired or under the influence of legal or illegal drugs or alcohol away from the Company premises, if such impairment or influence adversely affects the employee's work performance, the safety of the employee or of others, or puts at risk the Company's reputation.
- CDPR explicitly prohibits possession, use, solicitation for, or sale of legal or illegal drugs or alcohol away from the Company premises, if such activity or involvement adversely affects the employee's work performance, the safety of the employee or of others, or puts at risk the Company's reputation.
- CDPR will provide assistance through a range of preventative, educational and rehabilitative measures to overcome drug and alcohol problems that could impair an employee's ability to work safely.
- CDPR encourages our employees to maintain good health and well-being through a suitable lifestyle balance.

An employee/contractor has a responsibility to take prescription and pharmacy drugs in accordance with the instructions of their medical practitioner and normal directions relating to use of the drugs. In the instance that prescription medication could potentially affect the ability of the employee to perform their normal work duties safely, the employee must notify their immediate supervisor and operating department so that corrective control strategies can be implemented. Failure to advise may constitute misconduct.

In the event that drugs or alcohol are found on company premises, actions may include an investigation of the matter to attempt to determine who is responsible for the drugs or alcohol, or requiring workplace participants to undergo a drug or alcohol test.

Alcohol and Drug Testing and Disciplinary Process

The company will carry out screening for alcohol and drugs. Testing may be carried out on reasonable suspicion or following an accident or incident. The company also reserves the right to carry out random testing where it is considered appropriate. The disciplinary process will be invoked, and may lead to summary dismissal, in the case of any direct employee who:

- is removed from a workplace due to impairment or suspicion of impairment caused by substance abuse, drugs or alcohol consumption
- tests positive for illegal drugs
- is found to have a blood alcohol level that is indicative of impairment, or the equivalent in urine or breath samples
- refuses to undertake a screening test for alcohol or drugs, or
- is found supplying illegal drugs in any company workplace.

Persons found to be exhibiting the effects of drugs or alcohol may be required to have an appropriate test conducted. If a positive drug and alcohol reading is recorded at any time, the employee will be subject to disciplinary action, possibly including suspension and/or termination. An employee found to be exhibiting the effects of drugs or alcohol, or returning a positive drug or alcohol reading, or refusing to participate in testing, will be required to cease work immediately and leave the workplace.

As part of our commitment to maintaining safe work practices, CDPR is unable to allow employees to resume work until such time as they undertake testing and a negative result is obtained. Employees sent home or to a medical examination must report to the appropriate organization or operations department the following working day or when they are no longer under the influence of drugs or alcohol to discuss the incident. Employees who return a positive result or refuse testing will not be paid for this time off work until a negative drug test is returned.

Requests for Help

The Company will treat any requests for assistance from any employee who volunteers the information that they have a drink or drug related problem sympathetically. A request of this nature will not be

accepted subsequent to or immediately prior to testing for alcohol and drugs. During any regime of treatment the individual would remain subject to the requirements of this policy while at work.

Drug and Alcohol Management Strategies

- The Drug and Alcohol Policy will be explained to all new employees at induction.
- Suitable training will be provided, if needed, so that workers will know how to deal with drug and alcohol misuse appropriately.
- CDPR will ensure that where there is a risk to health and safety from drug or alcohol misuse, effective control strategies will be implemented.
- Such control strategies will focus on job performance and safety and will be implemented in conjunction with appropriate counselling.
- Workers are encouraged to report drug and alcohol problems that could present safety risks.
- Interventions in the case of safety-related drug and alcohol problems will be monitored and evaluated and followed up with further action if required.

Manager and Supervisor Commitment

Managers and supervisors are responsible, within the scope of their authority, for ensuring that:

- The objectives of this policy are integrated into work practices.
- Effective action is taken to prevent accidents, incidents, or injuries, which could result from drug or alcohol misuse.
- Risks arising from drug or alcohol misuse are identified, assessed and controlled.

Confidentiality

When addressing issues relating to alcohol and drug misuse, all parties should be sensitive to the individual's right to confidentiality, privacy and dignity. If the employee is aged less than eighteen years, the parent/guardian may also need to be involved.

This policy will be notified to sub-contractor and agency firms and it will be a condition of their contract with the Company that this policy applies to anyone they send to work in a company workplace. In the event of any of their employees being found in breach of any of the requirements of this policy they will be permanently excluded from all company workplaces. Visitors to company workplaces should be notified of the requirements of this policy.

13. EMPLOYEE PRIVACY POLICY

Cerro de Pasco Resources Inc. (CDPR) values your privacy. This policy statement governs our practices with respect to the collection, use and disclosure of personal information.

Personal information is information that is personally identifiable to you and may include your name, e-mail address, phone number and mailing address, as the case may be. Personal information does not include the name, title or business address or telephone number of an employee of an organization. CDPR will never disclose, sell or lease to any third party, any personal information that you provide on this site without your permission, unless required to do so by law.

Access

If you have previously provided us with personal information and wish to verify or remove your personal information, please contact us using the information provided at the end of this Privacy Policy.

Security

CDPR treats your personal information as private, confidential information and strives to ensure that such information is protected at all times. CDPR is diligent in its efforts to protect your personal information, however as data transmission over the Internet is not secure, we cannot guarantee that such information will not be lost, used unlawfully, or modified in a fraudulent manner. Consequently, CDPR bears no liability for the use that may be made of the information by you or any third party.

Changes

CDPR reserves the right to change this Privacy Policy Statement as it deems necessary and without prior notice. Any changes made to this Privacy Policy Statement will be in compliance with privacy laws in effect in Canada and will be posted on this page.

External Links

Due to the fact that we have operations in other countries, CDPR may transfer your personal information outside of the country where you live and/or work including to countries that may not provide the same level of protection in processing your personal information. All transfers of data to third parties and to countries outside the country where you live and/or work will comply with this Policy.

Contact Us

If you have any questions regarding CDPR's Employee Privacy Policy or practices, please contact the Vice President Legal by phone at, or by e-mail at, or in writing at .

14. FAIR DEALING POLICY

It is the Company's policy that each Director, officer and employee must endeavor to deal fairly with the Company's customers, suppliers, competitors, employees and anyone else with whom you have contact in the course of performing your job. No one should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice. Our goal is to conduct our business with integrity.

Examples of prohibited conduct include, but are not limited to:

- bribery or payoffs to induce business or breaches of contracts by others;
- acquiring a competitor's trade secrets through bribery or theft;
- making false, deceptive or disparaging claims or comparisons about competitors or their products or services; or
- mislabeling products or services.

We recognize the importance of fair business competition, and we will comply with antitrust laws. In general, these laws prohibit certain types of monopolistic behavior, activities designed to restrain trade, unfair methods of competition, deceptive acts or practices and other similar practices. Questions regarding application of the antitrust laws should be directed to the Corporate Legal Department.

Any information we obtain about our competitors will be gathered through ethical and legal means. We respect the confidential information and trade secrets of others, including former employers. If we are aware of a confidentiality obligation to a former employer, we will not violate that obligation. We will not ask or encourage newly hired employees to divulge their prior employers' confidential information.

15. POLICY ON PROTECTING CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

Confidential Information

All confidential information concerning the Company obtained by employees is the property of the Company and must be protected. Confidential information includes all non-public information that might be of use to competitors, or harmful to the Company or its customers, if disclosed. You must maintain the confidentiality of such information entrusted to you by the Company, its customers and its suppliers, except when disclosure is authorized by the Company or required by law.

Examples of confidential information include, but are not limited to:

- the Company's trade secrets;
- business trends and projections;
- information about financial performance;
- research and development ideas or information;
- mining, milling, and related processes;
- information about potential acquisitions, divestitures and investments;
- stock splits, public or private securities offerings or changes in dividend policies or amounts;
- significant personnel changes; and,
- existing or potential major contracts, orders, suppliers, customers or finance sources or the loss thereof.

Your obligation with respect to confidential information extends beyond the workplace. In that respect, it applies to communications with your family members and continues to apply even after your employment or direct relationship with the Company terminates.

Intellectual Property

The Company's intellectual property (such as ideas, inventions, discoveries, trade secrets, copyrighted material, patented material and trademarks) is a valuable corporate asset that we must work to protect. We also will respect the intellectual property rights of third parties.

Subject to certain limited exceptions, the Company owns everything (including products, processes, information, models, financial and data structures, software, documentation, methodologies and other materials, and all related intellectual property) that is created or modified by employees in connection with their jobs, produced using the Company's resources, or related to the Company's business or demonstrably anticipated research.

16. POLICY ON PROTECTING COMPANY ASSETS

All employees should endeavor to protect the Company's assets and ensure their proper use.

Company assets, both tangible and intangible, are to be used only for legitimate business purposes of the Company and only by authorized employees or consultants. Intangible assets include intellectual property such as trade secrets, patents, trademarks and copyrights; mining or processing plans; engineering ideas and designs; databases; Company records; salary information; and, any unpublished financial data and reports. Unauthorized alteration, destruction, use, disclosure or distribution of Company assets violates this Company Policy. Theft or waste of, or carelessness in using, these assets have a direct adverse impact on the Company's operations and profitability and will not be tolerated.

The Company provides computers, voice mail, electronic mail (e-mail), and Internet access to certain employees for the purpose of achieving the Company's business objectives. As a result, the Company has the right to access, reprint, publish, or retain any information created, sent or contained in any of the Company's computers or e-mail systems of any Company machine. You may not use e-mail, the Internet or voice mail for any illegal purpose or in any manner that is contrary to the standards embodied in this Policy or other relevant Company Policies.

You should not make copies of, or resell or transfer (externally or internally), copyrighted publications, including software, manuals, articles, books, and databases being used in the Company, that were created by another entity and licensed to the Company, unless you are authorized to do so under the applicable license agreement. In no event should you load or use, on any Company computer, any software, third party content or database without receiving the prior written permission of the Company's Information Systems Department to do so. You must refrain from transferring any data or information to any Company computer other than for Company use.

You may use a handheld computing device or mobile phone in connection with your work for the Company, but must not use such device or phone to access, load or transfer content, software or data in violation of any applicable law or regulation or without the permission of the owner of such content, software or data. If you should have any question as to what is permitted in this regard, please consult with the Company's Information Systems Manager. Any misuse or suspected misuse of the Company's assets must be immediately reported to the Compliance Officer.

Each of us is responsible for safeguarding and maintaining any Company property that is entrusted to our control. We will exercise reasonable care to avoid damage or unusual wear and tear. Similarly, we will protect Company assets by refraining from installing or using unapproved or unlicensed software, bypassing the Company's information security measures, or otherwise tampering with systems or data in an unauthorized or harmful manner. The integrity of these systems also requires that we secure our passwords and other personal access information in order to prevent unauthorized access to the Company's systems.

Corporate policies permit the occasional, incidental personal use of the Company's electronic communications systems. Management reserves the right, consistent with local law, to monitor and/or access all email messages or other system activity contained on or flowing through the system. No employee should have any expectation of privacy regarding email or Internet usage.

17. SECURITY POLICY – FINANCIAL

Financial Information

Cerro de Pasco Resources Inc. (CDPR) is committed to operate in accordance with its Code of Business Conduct and Ethics. Therefore, CDPR will provide, within the required time limits, complete, impartial, exact, and understandable financial information in all its public communications and in the documents it files with relevant governmental authorities. Consequently, CDPR is committed to ensure that all transactions are checked and are precisely and accurately recorded in the Company's accounts, in accordance with the procedures in force, and subject to audit.

CDPR is committed to continuously improving our financial security, in particular by:

- Respecting current laws and regulations
- Promoting a conviction that all failures in the field of financial security can be avoided
- Reporting and communicating in a clear manner, especially by reporting all issues that could affect the Company's public communications and disclosures
- Establishing an efficient control environment

Based on these commitments, CDPR shall:

- Demonstrate active involvement across line management and functional lines
- Define clear objectives and monitor their achievement
- Define employee responsibilities in the area of financial security, and provide the appropriate training
- Supply adequate resources
- Evaluate sensitive issues, assess related risks, and implement the necessary controls and other measures
- Implement and strictly enforce rules and procedures, report difficulties and failures, and undertake corrective actions designed to ensure continuous improvement of financial security
- Regularly assess the effectiveness and progress of the Company's financial security using key indicators, audits and executive reviews, and take any necessary corrective measures.

The personal involvement of each of us in the application of these principles is fundamental for CDPR to operate in a proper financial security environment, which is suitable to building sustainable and reliable relationships with its customers, shareholders, employees and partners.

Financial Document Security

Safely securing important corporate financial documents and information is required for company liability protection, corporate knowledge privacy, and for other legal concerns.

All physical financial documents should be stored in a secure room that is only accessible by authorized personnel. There should be electronic backup of these documents that is securely stored with password encryption. In most cases, physical documents should not leave the storage room. Electronic copies or photocopies should be provided on an as-needed basis to authorized personnel. Instructions on the proper use and storage of documents should be provided to any employee who accesses sensitive documents.

Instructions to All Supervisory Staff

Physical Security

- Store paper documents or files, as well as thumb drives and backups containing personally identifiable information, in a locked room or in a locked file cabinet. Limit access to employees with a legitimate business need. Control who has a key, and the number of keys.
- Require that files containing personally identifiable information be kept in locked file cabinets except when an employee is working on the file. Remind employees not to leave sensitive papers out on their desks when they are away from their workstations.
- Require employees to put files away, log off their computers, and lock their file cabinets and office doors at the end of the day.
- Implement appropriate access controls for your office space or building. Tell employees what to do and whom to call if they see an unfamiliar person on the premises.
- If you maintain offsite storage facilities, limit employee access to those with a legitimate business need. Know if and when someone accesses the storage site.
- If you ship sensitive information using outside carriers or contractors, encrypt the information and keep an inventory of the information being shipped. Also use an overnight shipping service that will allow you to track the delivery of your information.
- If you have devices that collect sensitive information, like PIN pads, secure them so that identity thieves can't tamper with them. Also, inventory those items to ensure that they have not been switched.

Electronic Security

Computer security for financial information is not just the realm of our Technology Department. Make it your business to understand the vulnerabilities of your computer system, and follow the advice of experts in the field.

- Identify the computers or servers where sensitive personal and financial information is stored.
- Identify all connections to the computers where you store sensitive information. These may include the internet, computers at branch offices, computers used by service providers to support your network, digital copiers, and wireless devices like smartphones, tablets, or inventory scanners.

- Assess the vulnerability of each connection to commonly known or reasonably foreseeable attacks. Depending on your circumstances, appropriate assessments may range from having a knowledgeable employee run off-the-shelf security software to having an independent professional conduct a full-scale security audit.
- Don't store sensitive consumer data on any computer with an internet connection unless it's essential for conducting your business.
- Encrypt sensitive information that you send to third parties over public networks (like the internet), and encrypt sensitive information that is stored on your computer network, laptops, or portable storage devices used by your employees. Consider also encrypting email transmissions within your business.
- Regularly run up-to-date anti-malware programs on individual computers and on servers on your network.
- Check expert websites and your software vendors' websites regularly for alerts about new vulnerabilities, and implement policies for installing vendor-approved patches to correct problems.
- Restrict employees' ability to download unauthorized software. Software downloaded to devices that connect to your network (computers, smartphones, and tablets) could be used to distribute malware.
- Scan computers on your network to identify and profile the operating system and open network services. If you find services that you don't need, disable them to prevent hacks or other potential security problems. For example, if email service or an internet connection is not necessary on a certain computer, consider closing the ports to those services on that computer to prevent unauthorized access to that machine.
- When you receive or transmit credit card information or other sensitive financial data, use encryption or another secure connection that protects the information in transit.
- Pay particular attention to the security of your web applications – the software used to give information to visitors to your website and to retrieve information from them. Web applications may be particularly vulnerable to a variety of hack attacks. In one variation called an "injection attack," a hacker inserts malicious commands into what looks like a legitimate request for information. Once in your system, hackers transfer sensitive information from your network to their computers. Relatively simple defenses against these attacks are available from a variety of sources.

Please note that CDPR has three other policies that are also related to these matters of security and protection of Company documents and information, namely our: Policy on Protecting Confidential Information and Intellectual Property; Policy on Protecting Company Assets; and, Security Policy - Cyber. These three policies should be read and be followed in conjunction with this Security Policy - Financial.

18. SECURITY POLICY – CYBER

Cerro de Pasco Resources Inc. (CDPR) is committed to protecting personal and corporate security by increasing cybersecurity awareness and taking measures to protect our technology, systems and digital assets.

All CDPR hardware, software and data is the property of the Company, this includes data stored on both personal and CDPR devices.

The safeguarding of our technology systems and data is the responsibility of all employees and anyone who conducts business on behalf of our Company.

The use of CDPR technology and systems will be monitored, reported and, where required, blocked without notice to mitigate risk and comply with relevant laws, regulations and standards. Data stored on CDPR technology systems may be accessed, reviewed or disclosed for the purposes of maintenance, business needs or to meet legal or policy requirements.

Inappropriate use of technology or data may expose our Company to risks, including viruses, security breaches, theft or loss of Company property or reputational damage.

Our Expectations of You

As members of our workforce, you are provided with the technology and data you need to undertake work for CDPR. You must safeguard and use technology and data securely and appropriately, and protect them against damage, loss, theft, alteration and unauthorized access.

You must not use our technology or data to commit cybercrime, duplicate or sell software or media files, share your account password, use technology or data for non-CDPR business purposes or cause reputational damage to the Company.

If you use our technology and data inappropriately, or inappropriate material is accessed or stored using our systems, disciplinary action may be taken and civil or criminal authorities may be notified. Inappropriate material includes pornographic or explicit images or text, materials promoting violence, hatred, terrorism or intolerance of others, or any other material that is deemed obscene or abusive.

You should never transfer, publish, remove or delete CDPR data or intellectual property without authorization.

Moderate personal use of CDPR technology is permitted. Moderate personal use does not impact your ability to perform your role or affect your commitment to the Company.

At Cerro de Pasco Resources Inc., we embrace the following guidelines.

All employees should always:

- Treat emails and other electronic forms of communication as official records and only use authorized applications to send these messages.
- Use authorized applications for business communications or to conduct business activities (i.e., do not use unauthorized applications for documenting or agreeing business transactions).
- Connect CDPR devices to our corporate network at least once a month to receive security updates.
- Make sure your personal devices contain the latest security updates.
- Return CDPR equipment and all CDPR information assets upon termination of your employment or contract.
- Report the damage, loss or theft of CDPR equipment or data to your line leader and our Technology Department.
- Make sure hardware, software, and data for which you are responsible are protected from unauthorized access.
- Notify the Technology Department if you've received a suspicious email by identifying the email as phishing.
- Secure laptops to prevent theft and lock your screen if leaving it unattended.
- Let the Technology Department know when you travel to high risk countries on the behalf of CDPR so they can give you single use devices.

And should never:

- Divulge your CDPR system passwords, write or store passwords in clear text or reuse passwords across multiple systems.
- Allow someone else to log on and operate systems and applications using your ID and user access rights.
- Leave technology or mobile devices unattended in public places.
- Engage in fraud, commit a crime online, or fail to report a fraud that you may know of.
- Install software on or connect hardware to CDPR devices without authorization.
- Open attachments or click links in emails that you've received from unknown senders.
- Deliberately access, store, send, post, or publish inappropriate material, or ignore others doing so.
- Access applications or systems for which there is no business justification.
- Store, send, post or publish CDPR proprietary information outside of any of our systems or devices without prior authorization.
- Use non-CDPR storage solutions, like external hard drives, USBs, personal Email, personal clouds, or internet storage services, to store CDPR data.
- Copy or transfer files that violates copyright laws.
- Ship our hardware or software outside of the country of origin without engaging the Technology Department.
- Disable security measures on CDPR technology systems or devices.