

# Cultural Heritage Protection Policy

Mining Mineral Resources S.A.S

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## 1. Purpose and Scope

MMR is committed to the **protection, preservation, and respectful management of cultural heritage** in all areas of operation. This policy ensures that MMR anticipates, avoids, and, when avoidance is not feasible, **minimizes, mitigates, or compensates** for any adverse impacts on cultural heritage sites and practices.

This policy applies to **all MMR operations, projects, and activities**, including those carried out by **subsidiaries, joint ventures, and contractors**. It encompasses all forms of cultural heritage, including **tangible and intangible heritage**, such as historic sites, monuments, artifacts, traditions, and cultural practices.

## 2. Principles

MMR adheres to the following core principles in the management of cultural heritage:

- **Respect for Cultural Heritage:** MMR recognizes the intrinsic value of cultural heritage to local communities, Indigenous Peoples, and societies. All operations **must** respect and protect cultural heritage sites and practices.
- **Impact Anticipation and Avoidance:** MMR **shall proactively** identify and assess potential impacts on cultural heritage at the earliest project stages. Avoidance **must** always be the first priority.
- **Mitigation and Offset Measures:** If avoidance is not possible, MMR shall work with affected communities to explore fair and culturally appropriate mitigation or offset measures.
- **Stakeholder Engagement & FPIC Where Applicable:** MMR will engage continuously with local communities, Indigenous Peoples, and cultural heritage experts. Where required by law or ethical standards, decisions affecting Indigenous cultural heritage shall follow the Free, Prior, and Informed Consent (FPIC) process. For other cultural heritage matters, MMR will engage in good faith consultations with relevant stakeholders.
- **Compliance with National & International Standards:** MMR **shall comply** with all relevant laws and standards, including UNESCO conventions, the IFC Performance Standards, and national cultural heritage laws.

### 3. Implementation Framework

To ensure consistent protection of cultural heritage, MMR will:

#### Step 1: Cultural Heritage Impact Assessment (CHIA)

- Conduct **mandatory** CHIAs **at least 12 months prior to project approvals** for projects located in or near areas of known or potential cultural heritage significance.
- Engage qualified cultural heritage experts and Indigenous representatives in the assessment.
- Publicly disclose assessment findings and mitigation strategies to affected communities.

#### Step 2: Integration into Project Planning

- Embed cultural heritage considerations **at all project phases**.
- Ensure **all employees, contractors, and partners** comply with cultural heritage protection protocols.

#### Step 3: Training & Awareness

- Conduct **mandatory cultural heritage training** for employees, contractors, and partners.
- Provide guidelines on proper conduct in culturally sensitive areas.

#### Step 4: Monitoring & Compliance

- Establish **real-time monitoring systems** to track operational impacts on cultural heritage.
- Conduct **quarterly independent audits** to ensure continuous compliance.
- Publish **public reports** on performance and corrective actions taken.

#### Step 5: Grievance Mechanism & Dispute Resolution

- Establish a culturally appropriate, tiered grievance mechanism accessible to all stakeholders:
  - **Internal resolution first** through MMR's Community Relations Team.
  - Escalation to an independent oversight body if unresolved.
  - **Final escalation** to external bodies (e.g., legal recourse, ombudsman) if necessary.
- Acknowledge grievances within 7 days and provide a resolution plan within 30 days.
- Ensure an **independent oversight body**, including cultural heritage experts and Indigenous representatives, reviews serious cases.

### 4. Commitment to Best Practices

MMR is committed to doing its best to respect and protect cultural heritage. We recognize the complexities involved and will approach challenges pragmatically, ethically, and in compliance with applicable laws and industry standards.

We will work **collaboratively** with affected communities, cultural heritage experts, and stakeholders to find **reasonable, fair, and culturally appropriate solutions** while balancing operational feasibility.

Where challenges arise, MMR will engage in continuous dialogue, seek expert guidance, and take corrective action as necessary to ensure cultural heritage protection remains a priority.

## 5. Review & Continuous Improvement

This policy shall be reviewed **annually** to ensure effectiveness, incorporating:

- **Stakeholder feedback** from Indigenous communities and cultural heritage experts.
- Updates to national and international standards.
- Findings from independent audits and compliance reviews.
- Key Performance Indicators (KPIs) for cultural heritage preservation, tracking progress over time.

## 6. Conclusion

MMR is committed to proactively preserving cultural heritage as a fundamental aspect of its corporate responsibility. Through structured engagement, responsible consultation, and rigorous compliance monitoring, MMR ensures that its operations honor and protect the cultural heritage of the communities and regions in which it operates.

Compliance Department:

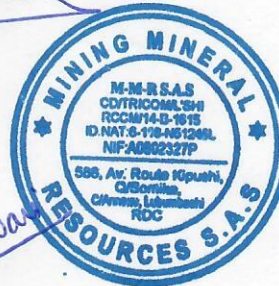
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