BOLIDEN

Anti-Corruption Policy

1 Zero Tolerance to Bribery and Corruption

Boliden is committed to a long-term development and strives to be the first sustainable link in the value chain of our metals. This includes taking extensive environmental, social and economic responsibility.

The work against bribery and corruption is an important part of Boliden's corporate responsibility work. We have high set standards both within our own organization and in relation to our business partners. Bribery, corruption or improper payment is unacceptable in Boliden's business dealings and transactions anywhere in the world. In addition to this Anti-Corruption Policy, Boliden applies the Code to Prevent Corruption in Business issued by the Swedish Anti-Corruption Institute.

2 How We Shall Act

This Anti-Corruption Policy and related Guidelines have been adopted as part of Boliden's anti-corruption program and are applicable to all employees of the Boliden group and any other individuals acting in Boliden's name or on Boliden's behalf. Boliden and all such persons shall always act in accordance with the following:

1. We do not, directly or indirectly, offer, promise or give any gifts, rewards or financial or other advantages or benefits to people who exercise public authority or decide on public procurement or to other public officials and neither to employees or contractors at public entities even if they do not participate in the exercise of public authority or public procurement.
2. We do not, directly or indirectly, offer, promise or give gifts, rewards or financial or other advantages or benefits to customers, suppliers or other business partners that could be considered given to influence or reward behavior or performance.
3. We do not, directly or indirectly, request, agree to receive or accept any gifts, rewards or financial or other advantage or benefit that could be considered given to influence or reward behavior or performance.
4. We do not, directly or indirectly, make facilitation payments (usually cash paid to a public official to facilitate routine government action).
5. We shall not provide any cash to our agents, co-operation partners and other representatives. Should we be providing other assets to these parties, we act with appropriate caution to ensure that the funds are not used for any activity that would be in breach of applicable rules and regulations, this Anti-Corruption Policy or Boliden's Sanctions or Anti-Money Laundering Policies.

BOLIDEN

6. We are mindful of avoiding conflicts of interest situations (where we may have personal interests in matters concerning Boliden).
7. We will never discipline or condone negative treatment of any person who complies with this Anti-Corruption Policy, no matter the financial or other consequences for us.
8. We will take appropriate action against individuals who do not comply with this Anti- Corruption Policy.

Boliden's requirements on its business partners regarding anti-corruption are set out in Boliden's Business Partner Code of Conduct.

Compliance with this policy is subject to internal audits.