



BUSINESS PARTNER CODE OF CONDUCT

MARCH 2022

THE FREEPORT VALUES: WHO WE ARE AND HOW WE WORK

Safety

Safety first—for ourselves, our coworkers and our communities.

- We promote safety, as well as health and wellness at our operations and in the communities where we live and work.
- No job is so important and no schedule so urgent that time cannot be taken to plan and perform work in a safe manner.
- Safe production requires that:
 - We report to work fit for duty, take responsibility for our own safety and look out for the safety of others.
 - We follow safety standards and controls, and identify and eliminate potential hazards.
 - We have the authority and responsibility to stop work if it is not being performed safely.
 - We promptly report safety incidents.

Respect

We treat each other and our stakeholders with respect.

- We are courteous to each other and those with whom we engage.
- We value the diversity, ideas, perspectives and experiences of our employees and our stakeholders.
- We make decisions without favoritism or negative bias.
- We embrace a culture that supports the free flow of information and sharing of ideas.

Integrity

We are honest, transparent and responsible.

- We are truthful and sincere.
- We communicate openly and accurately, inside and outside the company.
- We do what we say we will do.
- We take responsibility for our words, actions and decisions.

Excellence

We pursue excellence in our work.

- We take pride in our work and always do our best.
- We promote change, explore new options and challenge accepted practices.
- We collaborate to create and implement innovative ideas and to develop solutions to issues and concerns.
- We work with purpose to deliver high-quality results.

Commitment

We are committed to contributing to the long-term sustainability of the environment and communities where we work.

- We are accountable for our environmental and social performance.
- We strive to mitigate potential adverse environmental and social impacts throughout each project's life cycle.
- We engage in opportunities to maximize the benefits our operations deliver.
- We partner with our stakeholders to build local capacity and self-sufficiency beyond the presence of our operations.

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BUSINESS PARTNER RESPONSIBILITIES

Freeport-McMoRan (FCX) believes in doing business only with organizations and individuals (collectively Business Partners) who share our core values and demonstrate a high level of ethical and legal conduct.

We seek to establish mutually beneficial, long-term relationships with Business Partners who demonstrate their commitment to our Business Partner Code of Conduct (the Code), which is based on our company's Principles of Business Conduct. We expect our Business Partners to read, understand and follow the Code.

Business Partners are expected to abide by the laws of the countries in which they operate and conduct business according to the Code, even if local customs or practices differ from standards in the Code. If there is a serious conflict in local expectations, Business Partners should contact the local Global Supply Chain representative or Sales representative for direction. We recognize that many of our Business Partners have their own codes of conduct which may align with, or differ from, our Code. We expect our Business Partners with their own codes of conduct to use our Code as a baseline; that is, to understand that it sets forth the minimum expectations we have for you.



As part of our assessment of potential and existing Business Partners, Freeport-McMoRan issues an online self-assessment questionnaire via our Freeport Compliance eXchange platform, which focuses on issues of anti-corruption, international trade controls, human rights compliance and general responsible sourcing practices. All Business Partners who receive a request to complete this questionnaire are expected to do so in a timely manner.

Making Ethical Decisions

We expect our Business Partners to make ethical decisions, which requires a commitment to do the right thing regardless of the cost and to act consistently with and apply the Code and our values each day. All violations of the Code, suspected or actual, may be reported through the resources outlined in the Code. The Code is in addition to, and does not reduce or supersede, any contractual obligations between Freeport-McMoRan and its Business Partners.

STRENGTH IN VALUES: OUR PEOPLE

People are at the core of our business. We are deeply committed to supporting the health, safety and well-being of our workforce, host communities and the environment.

Promoting a Safe and Healthy Workplace

Safety is the foundation of our sustainability approach and is one of our core values. We are committed to creating a safe and healthy workplace and providing the training, tools and resources needed so our workforce can identify risks and consistently apply effective controls, so that everyone goes home safely, every day.

We maintain certification to ISO 45001 for our Occupational Health and Safety Management Systems at our operations globally. We expect our Business Partners to meet or exceed occupational health and safety standards and procedures, providing their employees with a safe and healthy workplace.

At a Freeport-McMoRan location, Business Partners and / or their employees may be required to complete hazard training or other training. If at any time Business Partners do not feel that they can perform their job in a safe manner or a safety incident occurs, they should Stop Work immediately and notify the Freeport-McMoRan Site Safety Department.

For additional information, please see the [Contractor Safety and Health Manual](#), and [Safety and Health Policy](#).

Valuing Inclusion and Diversity

We are committed to fostering a culture that is safety focused, respectful, inclusive and representative of the communities where we operate. We respect and value the different ideas, beliefs, experiences, talents, skills, perspectives, backgrounds, and cultures of our workforce. We strive for, promote and foster a workplace where everyone feels a sense of belonging, is treated with respect and their opinions are valued. We believe an inclusive environment gives our people the confidence to speak up, share ideas that drive innovation, achieve operational excellence, and drive the long-term sustainable success of our business.

Drug- and Alcohol-Free Environment

To do our jobs safely and efficiently, we must be able to think clearly and react quickly. Business Partners working at our operations must report to work free from the influence of any substance that could create an unsafe work environment or impair or impede work performance.

The use, possession, transfer, purchase or sale of illegal drugs (including marijuana) or alcohol is not permitted in the workplace. For purposes of this policy, workplace means all land (including parking lots), buildings, vehicles, equipment and other property owned or leased by Freeport-McMoRan. In addition, workplace includes all instances in which a Business Partner is performing work for Freeport-McMoRan, whether on or off FCX-controlled property, and all instances in which a Business Partner reasonably might appear to be acting within the scope of their assignments for Freeport-McMoRan.

Illegal drugs include prescription drugs that are used without a valid doctor's prescription or used inconsistent with doctor or pharmacist instructions. Any Business Partner using prescribed or over-the-counter medication that might affect their fitness for duty or ability to work safely and carry out the essential functions of their jobs, should immediately notify their Global Supply Chain representative or designated Safety personnel.

For more information, please see the Contractor Safety and Health Manual and the Safety and Health Policy.





STRENGTH IN VALUES: OUR COMPANY

Freeport is committed to the highest level of ethical and legal conduct in all of our business activities. We seek to communicate openly, honestly and transparently both inside and outside the company.

Avoiding Conflicts of Interest

Business Partners are expected to make business decisions solely based on sound business judgment. A conflict of interest may occur if a Business Partner has a bias or personal interest that interferes with the ability to make an objective business decision. Any potential conflicts of interest, actual or perceived, should be disclosed immediately to the local Global Supply Chain representative or Sales representative.

Gifts, Meals, Entertainment and Travel

Our business partners are vital to our success, which is why relationships with Business Partners must be based on sound business decisions and fair dealings. Business Partners should not offer personal gifts, favors, unusual hospitality, loans, entertainment or any other form of compensation or benefit to Freeport-McMoRan employees if doing so might impair, or appear to impair, a Freeport-McMoRan employee's ability to exercise judgment in a fair and unbiased manner. Gifts are never necessary to do business with Freeport-McMoRan. Business Partners should respect any Freeport-McMoRan employee's refusal to accept gifts or entertainment.

For questions about whether a particular gift or form of entertainment is acceptable, contact the local Global Supply Chain representative or Sales representative, or the Freeport-McMoRan Global Compliance team at compliance@fmi.com.



What Types of Gifts are Acceptable?

Our employees may accept meals and entertainment consistent with accepted business practice, for a legitimate business purpose and of nominal value, such as promotional items or small tokens of appreciation. Gifts of cash or cash equivalents are prohibited.



Maintaining Accurate Books and Records

A company's credibility is judged in many ways. One very important way is the integrity of its books, records and accounting. Business Partners are expected to provide complete, accurate and timely information about financial transactions and results of operations in accordance with applicable accounting regulations, securities laws and professional standards.

Protecting Confidential Information and Intellectual Property

We take various measures to protect our confidential information and intellectual property. Business Partners with access to this information are obligated to protect it as they would protect their own, and in accordance with any applicable confidentiality agreements. Business Partners may not share confidential Freeport-McMoRan information with third parties, including competitors of Freeport-McMoRan, without explicit written approval from the local Global Supply Chain representative or Sales representative. This obligation remains even after a business relationship between Freeport-McMoRan and the Business Partner ends. Business Partners must respect the intellectual property rights of Freeport-McMoRan, including its trademarks and copyrighted material.

STRENGTH IN VALUES: OUR MARKET

By acting ethically and honestly, Freeport-McMoRan aspires to earn the respect, trust and confidence of our stakeholders everywhere we do business. We compete fairly and in accordance with the highest ethical standards and all applicable competition laws.

Fighting Corruption and Bribery

Freeport-McMoRan prohibits corruption and bribery in all forms. We expect Business Partners to abide by international and local laws and regulations that forbid bribery of government officials and others, including the U.S. Foreign Corrupt Practices Act.

No promise or transfer of anything of value, directly or indirectly, may be made to a government official in an attempt to improperly influence a business decision or secure an improper advantage for Freeport-McMoRan or its Business Partners. Freeport-McMoRan prohibits Business Partners from promising, offering or paying bribes, kickbacks, illegal gratuities or similar payments to company personnel for the purpose of obtaining or retaining business with us.

For more information, please see our [Anti-Corruption Policy](#).

Promoting Fair Competition

We are committed to maintaining standards of fair business, advertising and competition, and observing applicable antitrust and competition laws. Business Partners are prohibited from participating in any type of unfair business practice aimed at limiting or impairing full and open competition for products and services provided to or sold by Freeport-McMoRan.

Adhering to Trade Restrictions

We are a global company, working in communities around the world. This global focus requires us to know and comply with laws that govern international trade. Listed below are some of the activities trade laws govern.

Export and import controls. Business Partners involved with the import and export of goods must obtain the appropriate trade licenses and keep up to date on the laws and regulations that apply. Business Partners are expected to make accurate customs declarations, including shipping papers and commercial invoices, and not mischaracterize the value or nature of goods in any way that may create liability for Freeport-McMoRan. Business Partners supplying goods to Freeport-McMoRan are expected to have controls in place to maintain cargo security throughout the supply chain. Freeport-McMoRan recommends Business Partners be a member of the U.S. C-TPAT, an equivalent standard in their country, or consider adopting heightened security guidelines established by these standards.



Illegal boycotts. U.S. law prohibits companies from complying with foreign boycotts that are not approved by the U.S. government. Business Partners should not cooperate with unsanctioned foreign boycotts or restrictive trade practices, or solicit boycott cooperation through any method, including oral, written, bid or proposal materials, letters of credit, or shipping instructions. Any Business Partner who receives a request to participate in an unsanctioned foreign boycott in connection with their FCX-related business must report the request immediately to the Freeport-McMoRan Global Compliance team at compliance@fmi.com or via the Freeport-McMoRan Compliance Line.

Economic trade sanctions. At times, the U.S. Government places trade sanctions that restrict trade with specific countries, individuals or entities. It is important that Business Partners take steps to avoid conducting business with any sanctioned country or individual in connection with their business with, or on behalf of, Freeport-McMoRan. Freeport-McMoRan prohibits the onward sale or diversion of its products to countries, entities or persons subject to U.S. or international sanctions. For more about U.S. sanctions programs, visit the U.S. Department of Treasury, Office of Foreign Asset Controls online at <http://www.treasury.gov/resource-center/sanctions>.

STRENGTH IN VALUES: OUR STAKEHOLDERS

Freeport is dedicated to responsible production practices, which includes working collaboratively with our stakeholders to support shared value creation in the host communities and countries where we operate.

Contributing to Our Communities

We seek to proactively collaborate with our host communities and Indigenous Peoples adjacent to our operations to support shared value creation. We respect the cultural heritage, values, interests, livelihoods and aspirations of Indigenous Peoples, including their physical, spiritual and cultural connection with the land and local environment.

Freeport-McMoRan works actively through engagement, investment and partnership activities to support host communities in maximizing the social and economic benefits of mining, with a particular focus on capacity building and resilience. We collaborate with our host communities, civil society organizations and local governments to design, implement and evaluate development opportunities that seek to maximize the benefits of mining, including post-closure.

We expect Business Partners to operate in a way that respects local host communities and Indigenous Peoples. We encourage Business Partners to maximize local development opportunities by hiring and procuring locally, to the extent feasible, to maximize the positive impacts of our supply chain in the local economy.

For more information, please see our [Social Performance Policy](#).

Human Rights and Labor

Respect for human rights is a long-standing commitment of Freeport-McMoRan. Our policy is to conduct our operations in a manner consistent with the International Bill of Human Rights, with the laws and regulations of host countries, and the United Nations Guiding Principles on Business and Human Rights. We align our security programs with the guidelines set forth by the Voluntary Principles on Security and Human Rights.



We expect our Business Partners to treat all persons with dignity and respect. This includes:

- Ensuring fair treatment and work conditions for all employees, including rights to freedom of association and collective bargaining
- Prohibiting forced, compulsory or child labor, and human trafficking
- Prohibiting harassment and discrimination
- Establishing and maintaining grievance mechanisms to record and address concerns in a timely and transparent manner

For more information, please see our [Human Rights Policy](#).



Responsible Sourcing of Minerals and Metals

In line with our longstanding commitment to Human Rights, Freeport-McMoRan is committed to implementing the OECD Guidelines for Responsible Mineral Supply Chains in Conflict-Affected and High-Risk Areas (the Guidelines). This means that while sourcing from, or operating in, conflict-affected and high-risk areas, we will neither tolerate nor profit from, contribute to, assist with or facilitate the commission by any party, of any of the risks associated with the extraction, transport or trade of minerals specified in Annex II of the Guidelines, which are commonly referred to as gross human rights abuses. It is our expectation that the Business Partners we engage with in the procurement of minerals and metals understand what these risks are, work to understand where they may exist in their supply chains and collaborate with their business partners – including FCX – to reduce, mitigate or eliminate them.

Gross human rights abuses can include or be indicated by the following:

- Any forms of torture, cruel, inhuman and degrading treatment
- Any forms of forced or compulsory labor, which means work or service which is exacted from any person under the menace of penalty and for which said person has not offered themselves voluntarily
- The worst forms of child labor, in accordance with ILO Convention No. 182
- Other gross human rights violations and abuses such as widespread sexual violence
- War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide
- Direct or indirect support to (i) non-state armed groups or their affiliates (ii) public or private security forces that is not in line with Annex II of the Guidance
- Bribery and fraudulent misrepresentation to conceal or disguise the origin of minerals
- Money laundering

Environmental Stewardship

At Freeport-McMoRan our goal is to conduct our mining and processing operations in a manner that minimizes adverse impacts on the environment and supports protection of the ecosystems through responsible environmental stewardship. From conserving biodiversity, to taking action to decarbonize our operations, to water stewardship and overall pollution prevention, we are committed to sound environmental practices at all of our operations with a focus on continuous improvement. We comply with all applicable environmental laws and regulations, and maintain environmental management systems that are ISO 14001 certified or meet an equivalent standard.

Freeport-McMoRan expects Business Partners, as stewards of the environment, to comply with environmental laws and regulations.

For more information, please see our [Environmental Policy](#).



THE IMPORTANCE OF SPEAKING UP

Each of us has a responsibility to report suspected violations of the Code, FCX policies and procedures, and the applicable law to the appropriate personnel as quickly as possible. This prompt reporting ensures that any issues are addressed and resolved in a timely manner.

FCX Compliance Line

The Freeport-McMoRan Compliance Line is available 24 hours a day, seven days a week to report incidents or other concerns that raise legal or ethical concerns. Business Partners may remain anonymous but must identify their relationship to Freeport-McMoRan.

Country	Number
Australia	1-800-565-779
Chile	800-719-914
Indonesia	0-800-1503234
Netherlands	0800 0235148
Peru	0800-78-539
Spain	900 876 845
United Kingdom	0-800-090-3665
United States	800-295-6783
Other locations	AT&T Direct® Access

Resources for Getting Help and Reporting Possible Violations

For questions about the Code, to discuss issues or to report a concern:

- Review company policies available on www.fcx.com
- Contact your local Global Supply Chain representative
- Contact your Sales representative
- Email the Freeport-McMoRan Global Compliance team at compliance@fmi.com
- Contact the Freeport-McMoRan Compliance Line via phone
- Contact the Freeport-McMoRan Compliance Line online
 - fcxcompliance.ethicspoint.com or
 - Scan the QR Code below:



AT&T DIRECT® ACCESS DIALING

1. Dial the AT&T Direct® Access Code for your country / location - <http://www.business.att.com/bt/access.jsp>
2. At the prompt dial 800-295-6783
3. The call will be answered in the language selected. Please hold on the line, as it may take a few minutes to obtain an interpreter.



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