PRINCIPLES OF BUSINESS CONDUCT

Strength In Values

FREEPORT-
MCMORAN

Our Values

Who We Are and How We Work—Everyone, Everywhere and Everyday

SAFETY

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

- We promote safety and 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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Leadership Message

At Freeport, our values of Safety, Respect, Integrity, Excellence and Commitment are at the heart of everything we do. Our Principles of Business Conduct – titled Strength in Values – guides our team's efforts and clearly defines the standards to which we all are accountable.

It's essential employees at all levels of our organization read, understand and follow our PBC. The core values detailed are what we have built our reputation on as a company and are important to everyone's commitment to doing what's right.

The PBC covers various topics – from workplace safety to conflicts of interest to protecting company assets – and features scenarios to illustrate our values in action. Using it will help you apply our core values to your daily business decisions and interactions.

Another important aspect is our shared responsibility to speak up if something doesn't feel right, knowing the company will not tolerate retaliation of any kind for raising a question or a concern in good faith.

You all play an important role in upholding our culture of doing what's right, so please take a few minutes now to read our PBC. If you have questions or a specific situation, never hesitate to ask. By being better informed, you can make better decisions, and together, we will continue to prosper.

Thank you for all you do each day to make Freeport what it is. I am honored to work with this winning team. Together, we are proudly creating better futures for all.

Sincerely,

Kathleen Quirk
President and Chief Executive Officer

Our Responsibilities

As employees, we are responsible—individually and collectively—for how FCX conducts business. Following the PBC gives us the strength to do what's right.

We do our part when we:

- Act with honesty and integrity
- Follow the law and FCX policies and procedures
- Treat each other with respect
- Use common sense and sound judgment
- Seek guidance when unsure about the right thing to do
- Speak up when we see a problem
- Cooperate with investigations
- Complete all assigned training

FCX provides employees training on the PBC. Select employees, including certain managers, supervisors and other Company leaders, are required to certify their understanding of, and compliance with, the PBC and values on an annual basis.

Leading by Example

Each of us has the opportunity to be a leader—at work, at home and in our community. At FCX, we lead by example and uphold the PBC and our values. We also help to ensure that those who report to us and those we work with understand our PBC, values, and applicable policies, procedures and laws.

Each of us has the opportunity to be a leader—at work, at home and in our community.

Leaders set the right tone by:

- Demonstrating the highest ethical standards and quality in our work and expecting the same from every team member
- Being proactive and taking steps to prevent problems before they happen
- Encouraging employees to speak up when something is wrong
- Ensuring all employees complete any necessary or assigned training
- Being visibly engaged and proactive in supporting ethics and compliance matters

Suppliers

FCX believes in doing business only with suppliers of goods or services, including contractors, consultants, vendors, their subcontractors and any other contracted third parties (collectively Suppliers) who share our 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 (Business Partner Code) and ensure their employees working at Company operations or on FCX's behalf understand and follow the Business Partner Code.

We expect our Suppliers to abide by the laws of the countries in which they operate and behave according to the Business Partner Code. All suspected violations of the Business Partner Code should be reported immediately through the resources outlined in the PBC. The Business Partner Code is in addition to, and does not reduce or supersede, any contractual obligations.

WHAT WE DO:

We require Suppliers to:

- Provide their employees with a healthy and safe workplace
- Operate in compliance with all local laws and regulations
- Uphold and follow the Business Partner Code
- Inform FCX of any possible violation of the Business Partner Code

WHAT WE DON'T DO:

- Permit Suppliers to use child labor or forced labor
- Allow any kind of bribe, kickback or other form of personal payoff tied to our business arrangements

For additional Supplier information, please see the Business Partner Code.

Making Ethical Decisions

Making ethical decisions requires a commitment to do the right thing regardless of the cost, to act consistently and apply the PBC and our values each day, and to consider any potential consequences. The questions below will help you think through a difficult decision so that you can make smart and ethical business decisions. If you answer "no" or "I don't know" to any of the questions, talk to your supervisor.

- Is it legal?
- Is it consistent with our PBC, values, policies or procedures?
- Can I rationally and honestly defend my decision?
- Would I want to see this published in the news?

Strength in Values: Our People

Our employees are our greatest strength. Ensuring a safe and healthy workplace where everyone is treated fairly and with respect is a high priority at FCX. We operate in regions of varying ethnic, religious and cultural backgrounds and are often the largest employer in local communities. The diversity and various perspectives of our workforce make us stronger.

Commitment to a Safe and Healthy Workplace

Our highest priority is the health and safety of our employees and their families. Our objective is for zero workplace fatalities, injuries and occupational illnesses. We are committed to providing a safe and healthy workplace and ensuring we all have the knowledge, skills and attitudes needed for Safe Production.

FCX provides the training, tools and resources needed for employees to identify risks, eliminate hazards and work safely. If at any time you do not feel that you or a coworker can perform a job in a safe manner, stop work immediately and talk to your supervisor. Always report any unsafe conditions and job-related injuries or illnesses immediately.

Each of us has a responsibility to recognize and report health and safety hazards. If a hazard cannot be eliminated, employees must work together with supervisors and safety staff to ensure that it is effectively controlled. We share information about potential fatal events, near misses, best practices and other safety-related information throughout the Company so we can learn from each other and improve safety practices.

For additional information, please see our Corporate Safety and Health Policy on FM Web.

SAFETY:
We promote safety and health and wellness at our operations and in the communities where we live and work.

Safety is an integral part of every job we do. No job will be considered so important and no schedule so urgent that time cannot be taken to perform work safely. Speak up and stop work if it's not safe or unclear and talk to your supervisor immediately or contact your local Health and Safety representative.

WHAT WE DO:

- Report to work fit for duty
- Take responsibility for my own and others' safety
- Assess risk and eliminate hazards using specified controls
- Follow all standard operating procedures
- Speak up and stop work if it's not safe or unclear
- Promptly act on unsafe conditions

WHAT WE DON'T DO:

- Begin a job without proper planning
- Take unnecessary risks
- Ignore unsafe situations
- Downgrade the severity level of safety incidents to avoid reporting
- Compromise safety by rushing to complete our work

We commit to work safely and put safety first every day, holding ourselves and others accountable for our actions.

Values in Action

Q: John, a long-time company employee, recently interviewed for a position in a different department. One interviewer asked "how much longer do you expect to be with the company, and will you have time to continue to advance?" While John answered the questions, he was uncomfortable with the line of questioning and felt there was not enough focus on his skills and qualifications during the interview.

Should John say something?

A: Yes. We treat people fairly and do not make decisions based on age. We value a diverse workforce and the individual skills and experiences of our employees. Talk to your supervisor or a Human Resources representative.

Valuing Diversity and Inclusion

The many cultures, perspectives and life experiences of our people are a source of strength at FCX. We are committed to a workplace where everyone feels like they belong, where they are treated with respect and their opinions are valued, and that encourages people to speak up and share ideas. These ideas help drive innovation and operational excellence.

WHAT WE DO:

- Treat each other with respect and are courteous to each other and those with whom we engage
- Seek out and value diverse points of view and the unique contributions of everyone with whom we work
- Encourage and reward teamwork
- Make employment decisions based on facts and business needs rather than favoritism and bias

WHAT WE DON'T DO:

- Allow personal opinions of a person's culture, appearance or lifestyle to affect our ability to make smart business decisions
- Show favoritism or bias based on personal beliefs

We **value** the diversity, ideas, perspectives and experiences of our employees and our stakeholders.

Values in Action

Q: Carla and Pedro were involved in a romantic relationship which had been disclosed to HR and managed appropriately. Recently their relationship ended. While they do not work in the same department, there is tension when they have to interact on projects, and the other employees are uncomfortable when Carla and Pedro communicate using derogatory and inappropriate comments.

Should someone report this behavior or just wait for some time to pass until the tension is reduced?

A: We should speak up if a person's words or actions make us uncomfortable. In this case, Carla and Pedro, as well as the other impacted employees, should be able to address this behavior through discussion. If they are unable to resolve it through discussion or are uncomfortable raising it with their colleagues (Carla and/or Pedro), they can report it to their Human Resources representative. Each of us should feel comfortable in the workplace.

Promoting a Respectful Workplace

The Company promotes a positive and productive work environment in which every employee is respected, valued and feels safe at work. Harassing behavior works against these efforts and violates our value of respect. FCX does not tolerate any form of harassment or discrimination.

Harassment includes derogatory, degrading or demeaning words or gestures, such as making comments to a coworker based on race, color, sex, religion, national origin, sexual orientation, gender identity or expression, disability, age, veteran's status, or any other characteristic protected by law. It also includes violent or threatening behavior. You must exercise caution when making offhand comments or jokes and be sensitive to the fact they could unintentionally hurt or offend another person.

WHAT WE DO:

- Think before we act or speak—recognizing how actions and comments might be received or misunderstood by others
- Act in a considerate, courteous and appropriate manner
- Report harassment or discrimination

WHAT WE DON'T DO:

- Make comments or gestures, or engage in violent or threatening behaviors, that create an intimidating, hostile or offensive work environment
- Verbally abuse others or make sexual, ethnic or racist jokes and comments
- Display pornography or any kind of offensive pictures, objects or symbols
- Pursue unwanted physical contact or unwanted sexual or personal advances
- Offer job benefits in exchange for sexual favors

Sexual Harassment Takes Many Forms

All forms of sexual harassment go against our values and are prohibited by FCX. These include, but are not limited to, unwelcome physical contact of a sexual nature, requesting sexual favors in exchange for job benefits, threatening penalties if sexual favors are not granted, and any conduct of a sexual nature that interferes with an individual's work performance or creates an offensive work environment.

Ensuring a Drug- and Alcohol-free Workplace

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

To maintain a safe work environment, the Company may require drug and alcohol testing in the following circumstances: post-offer/pre-employment, for cause, post-accident, random or as otherwise provided by applicable Company policy. All testing will be performed to the extent permitted by applicable laws.

WHAT WE DO:

- Report to work fit for duty
- Speak up immediately if we see a coworker who may be under the influence of alcohol or drugs while at work
- Use good judgment when alcohol is served at a Company-sponsored event or at customer or Supplier meetings, trade association meetings, conferences or other events
- Tell our supervisor if we are prescribed a controlled substance and are working in a safety-sensitive position

WHAT WE DON'T DO:

- Come to work under the influence of alcohol, illegal drugs, improperly used medications or any other controlled substance
- Consume or be under the influence of alcohol or illegal drugs or abuse prescription or nonprescription drugs during work hours, on Company premises or in Company vehicles, or while conducting Company business offsite
- Use, possess, purchase or sell illegal drugs on Company premises, on Company time or while using Company equipment

For more information, please contact your local Human Resources department.

Values in Action

Q: Jacob is getting ready to start his shift when his coworker Joni comes in. She seems drowsy and unfocused. When Jacob asks what's wrong, Joni mentions that she had to take some pain medication and just needs a few minutes to rest before starting her shift. Jacob is concerned about Joni's alertness but doesn't think he should mention it as she only took over-the-counter pain medication.

Should he say something?

A: Definitely. Joni could hurt herself or someone else in this condition. It's everyone's responsibility to maintain a safe work environment. That means reporting to work fit for duty and looking out for the safety of others. Talk with your supervisor, Health and Safety or Human Resources representative immediately so they can address the issue.

SAFETY:
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 treat each other and employee personal information with **respect**.

Values in Action

Q: Recently, Kevin was putting together a special projects team to travel to another site to evaluate best practices. Kevin asked Stacey if he could talk with employees on her crew to see if they would be interested in joining the special projects team. Stacey said there were several who might be, but the timing may not be right for Paul based on his recent medical issue which she shared with Kevin.

Should Stacey have shared Paul's medical information without permission?

A: No. While Stacey may have had the best of intentions when sharing Paul's medical situation, the Company is committed to safeguarding employee personal information, privacy and confidentiality. Stacey should not have shared the employee's private information with Kevin.

What Employee Information is Considered Personal?

Employee personal information can include home address, date of birth, age, race, religion, account numbers and medical records, to name a few. Basically, it's any information that individuals may not wish to share publicly.

Protecting Employee Privacy and Information

FCX respects employee personal information and complies with all applicable laws that protect the privacy and confidentiality of employees' personal, medical, and financial records and information. We expect employees who have the appropriate authorization and clear business need to access personal information to treat it appropriately.

We respect the need for a strong work-life balance and the right of employees to keep personal activities outside the workplace confidential. FCX normally does not take an interest in personal conduct outside work unless such conduct impairs your work performance or safety or affects the reputation or legitimate business interests of the Company.

Use of Company-provided equipment, services and time spent on Company property should not be considered private. The Company reserves the right to inspect and search its facilities and property, including computers, vehicles, telephone records, cell phones, lockers, email, Internet usage, business documents and other workspaces, as well as personal containers on Company property, such as lunch and tool boxes, to the extent permitted by applicable law.

WHAT WE DO:

- Treat employee personal information confidentially and with the appropriate safeguards
- Restrict access to records containing employee information to those authorized and with a clear business need for the information
- Follow all applicable privacy laws and Company privacy policies

WHAT WE DON'T DO:

- Share or disclose employee personal information unless authorized by the employee or required under applicable law
- Use personal information inappropriately

For more information, please see the Records Management Policy and MIS End User Policy on FM Web.

We have an obligation to each other, our shareholders and our suppliers to make all business decisions solely on the basis of **sound business judgment**.

Strength In Values: Our Company

As employees of FCX, we are responsible for our actions and decisions. We are honest and transparent in our work and uphold the highest standards when conducting Company business and handling Company information. Our communications are open and accurate both inside and outside the Company.

INTEGRITY:
We are honest, transparent and responsible in all business dealings.

Avoiding Conflicts of Interest

We have an obligation to each other, our shareholders and our Suppliers to make all business decisions solely on the basis of sound business judgment. A conflict of interest may occur if we have a bias or personal interest that interferes with our ability to make an objective business decision in the best interest of the Company. This may include:

- Outside jobs and affiliations with Suppliers, customers or competitors, or government agencies
- Participating in the interview or hiring process of friends or relatives
- Having a personal relationship with another employee for whom you influence decisions, such as salary, performance rating or promotions
- Serving as a board member of another organization
- Investments, including those of relatives, that might influence or appear to influence your judgment
- Giving or receiving gifts on behalf of FCX

While it's impossible to present an exhaustive list of conflicts of interest, the following section provides guidance on some of the areas in which conflicts of interest are most likely to occur.

For more specific guidance, refer to the Conflicts of Interest Guidelines on FM Web.

Conflicts of interest aren't necessarily wrong or unethical, but it is important that they be identified and appropriately managed. It's also important to avoid any actions or relationships that create, or even appear to create, a conflict of interest.

Values in Action

Q: Kennedy, a planner in our group, also owns a food services business that provides meals to a Freeport site. As his role does not require him to select food service vendors, he didn't mention the relationship to the site when he was hired.

Should he have disclosed this business?

A: Yes. Even if Kennedy's role does not require him to interact with food service vendors, Company policy dictates that he disclose his business ownership. Transparent disclosure addresses any perception of bias in the vendor selection process.

Outside Employment and Activities

A conflict of interest may arise if you take a second job working for a customer, Supplier, competitor or government body with regulatory authority over the Company (generally not permitted), or if your outside employment or activities interfere with your ability to fulfill your responsibilities to FCX.

WHAT WE DO:

- Disclose all outside employment or consulting opportunities
- Ensure that outside activities do not interfere with our job responsibilities or performance
- Obtain approval from our supervisor or manager before serving on any board or advisory board of any for-profit organization

WHAT WE DON'T DO:

- Allow any outside employment or other activities to interfere with our job responsibilities
- Work for a customer, competitor or Supplier unless approved by management
- Risk damaging the Company's business or reputation

Personal/Significant Financial Interests

Each one of us must be careful that our investments, or those of our relatives, do not impair our ability to make objective decisions on behalf of FCX. Significant financial interest refers to any financial interest that might influence, or might reasonably be thought by others to influence, an employee's judgment or action when conducting Company business.

WHAT WE DO:

- Understand our personal and/or significant financial interests may create, or be perceived to create, a conflict of interest
- Disclose any significant financial ownership interest in a business that does business with or seeks to do business with FCX

WHAT WE DON'T DO:

- Own, either directly or indirectly, a significant financial interest in any business that does business with or seeks to do business with FCX, without prior disclosure and approval from management

Relationships with Family and Friends

FCX recognizes and respects our employees' right to associate freely and to pursue personal relationships with those we encounter in the work environment. In return, each of us must use good judgment to ensure that those relationships do not negatively affect our job performance, our ability to supervise others or the work environment.

Similar situations may occur when working with customers or Suppliers. Conflicts of interest take different forms, such as directing Company purchases, leases or sales through a relative or friend, participating in the review, selection or contract negotiation of a Supplier you know personally, or being part of the hiring process for—or supervising—a relative or friend.

WHAT WE DO:

- Make decisions objectively and act in the best interest of the Company, not our personal interest
- Disclose to our supervisor any family or personal relationships with those we supervise, sell to or buy from
- Follow the instructions of our supervisor in dealing with any conflict of interest

WHAT WE DON'T DO:

- Interview, select, hire or supervise anyone with whom we have a personal or family relationship without discussing it with our supervisor or Human Resources
- Manage or make decisions related to Suppliers that we know to employ friends or family without supervisor approval

Values in Action

Q: Sunarti, a new Freeport hire who comes from a multi-generational mining family, now reports directly to her cousin, Ismail. She asked Ismail if she needs to disclose their family relationship to HR as they're in the same reporting line. Ismail says no as they don't live in the same household.

Is Ismail correct?

A: No. Even though Ismail doesn't live in the same household as Sunarti, they are relatives and the relationship should be disclosed to Human Resources and Ismail's manager. Working in the same reporting line as a relative may create a conflict of interest or the appearance of a conflict of interest.

Disclosing a Potential Conflict of Interest

If you're in a situation where there might be a conflict of interest or where there might be the appearance of a conflict:

- Disclose your situation to your supervisor or your local Human Resources representative immediately
- Remove yourself from any related decision-making process until the conflict is resolved by the Company
- Support the company's decision on how to manage the potential conflict

Values in Action

Q: After a contract review meeting with a supplier, the supplier invites the FCX team and their spouses to a modest dinner at a nearby restaurant.

Is this a potential conflict of interest?

A: Yes. Even though the meal is modest, there is no business reason for the contractor to include spouses at the dinner. Accepting meals, tickets or gifts such as these can negatively impact the Company's reputation of dealing fairly with Suppliers and can create a perception of unfair treatment or favoritism. Employees should politely refuse the gift or meal invitation, and then inform their supervisor, the contract administrator or a Human Resources representative.

Gifts, Meals, Travel and Entertainment

We have many Suppliers who are vital to our success, which is why relationships with Suppliers must be based entirely on sound business decisions and fair dealing. Business gifts and entertainment can build goodwill, but they also can make it harder to be objective about the person who provides them. None of us should give gifts and entertainment to, or accept them from, any organization or individual if doing so might impair, or appear to impair, our ability to perform Company duties or to exercise judgment in a fair and unbiased manner. Many departments have specific guidelines about giving and accepting gifts and entertainment, including gifts and entertainment for government officials, so be sure to check local site policies as well as the FCX Conflicts of Interest Guidelines and FCX Anti-Corruption Policy and Guidelines, or talk to your supervisor or Human Resources representative for more information.

WHAT WE DO:

- Base our decisions on sound business judgment
- Understand our site-specific and/or department-specific policies on giving and receiving gifts and entertainment
- Decline personal gifts from Suppliers and gifts beyond a nominal value
- Obtain supervisor approval before giving gifts to a customer or Supplier beyond a nominal value
- Disclose any gift received beyond a nominal value

WHAT WE DON'T DO:

- Accept gifts or entertainment when doing so might appear to, or actually, cloud our judgment
- Give gifts or entertainment in order to exert improper influence
- Accept travel from Suppliers without management approval
- Allow customers or Suppliers to pay for lavish meals or provide meals on a regular basis

What Types of Gifts are Acceptable?

Certain gifts are generally acceptable, unless prohibited by site- or department-specific policies. Gifts should be unsolicited, of nominal value and infrequently given. They should not be cash or a cash equivalent, such as a gift card. Gifts should not be given to influence a person or decision or take advantage of our position with a Supplier. Accepting gifts, travel or entertainment during a bidding process is prohibited.

Competing with the Company

None of us should engage in activities that are in direct competition with the Company. We should not benefit personally from business opportunities that we discover through the use of Company property, information or position. Similarly, we should not take personal advantage of information we learn as a result of our position with FCX.

Values in Action

Q: Miguel, who works with Freeport's exploration group, also owns a family commercial real estate business in Arizona.

Could his knowledge of FCX's exploration activity put him in a position where his family business might compete with the company?

A: Yes. Miguel's awareness of planned exploration activities gained through his role with Freeport could result in a situation where his business would benefit from opportunities identified through that internal knowledge.

INTEGRITY:
We communicate openly and accurately, inside and outside the Company.

Detecting Fraud

Fraud is the intentional act of deception or misrepresenting facts for personal gain or to benefit or cause damage to someone else or the Company. No company is immune to the risk of fraudulent activity. In accordance with our laws and regulations, it is our responsibility to take appropriate action when these situations are suspected or may occur. FCX does not tolerate fraud, any coverup of fraud or the failure to report suspected fraud and will take disciplinary action against these types of activities.

Our employees, officers, directors and Suppliers play an important role in preventing, detecting and reporting fraud. You must report all known or suspected fraud, no matter how insignificant the dollar amount or how the issue may appear. For questions about potential fraudulent activity or to disclose fraud, talk to your supervisor, Human Resources representative, local Compliance Officer or contact the FCX Compliance department.

Creating and 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. FCX is committed to providing our shareholders with full, accurate, timely and understandable information about the Company's financial transactions and results of operations in accordance with applicable securities laws.

We are responsible for keeping accurate books, records and accounts in reasonable detail. Every one of us, regardless of our position within the Company, has an obligation to make sure that the information we contribute to FCX's financial records is complete, accurate and timely. We are responsible for the accuracy of all the records we generate and data we input, from individual timecards to inventory reports and balance sheets.

WHAT WE DO:

- Carefully follow all Company recordkeeping procedures and guidelines
- Ensure all necessary information is provided and is accurate and timely
- Provide actual receipts or backup documentation when required

WHAT WE DON'T DO:

- Keep off-the-books accounts
- Provide false or incomplete records, or intentionally omit necessary information
- Mislead or misinform anyone about our finances or business operations

Managing Our Records Appropriately

Various laws and regulations require FCX to record and preserve business information. Managing our records effectively helps us to make better business decisions and meet our legal, regulatory and contractual obligations. Our Records Management Policy and Records Retention Schedule provide guidelines and procedures for the retention, proper storage and disposal of records. The Company's business records include all documents related to its business, regardless of media type.

From time to time, a government investigation, an audit or a legal proceeding may require that certain records be held and preserved. You will be advised of the issuance of a legal hold notice. While in effect, a legal hold notice overrides the Records Management Policy and Records Retention Schedule. You should follow the instructions in the legal hold notice until you receive further instructions from the Legal department.

WHAT WE DO:

- Carefully follow the Company's Records Management Policy and Records Retention Schedule
- Store records in approved physical facilities or electronic repositories to ensure that they are secure and accessible to the business
- If unsure about a record, always err on the side of preservation and contact the Records Management department for guidance

WHAT WE DON'T DO:

- Destroy, shred, conceal or otherwise alter documents or records potentially relevant to a government investigation, an audit, internal investigation or a legal proceeding (this could lead to criminal or civil liability for the Company and for those involved)
- Dispose of or store any Company records in a manner inconsistent with our Records Management Policy

For more information, please see the Records Management Policy and Records Retention Schedule on FM Web.

What Are Company Records?

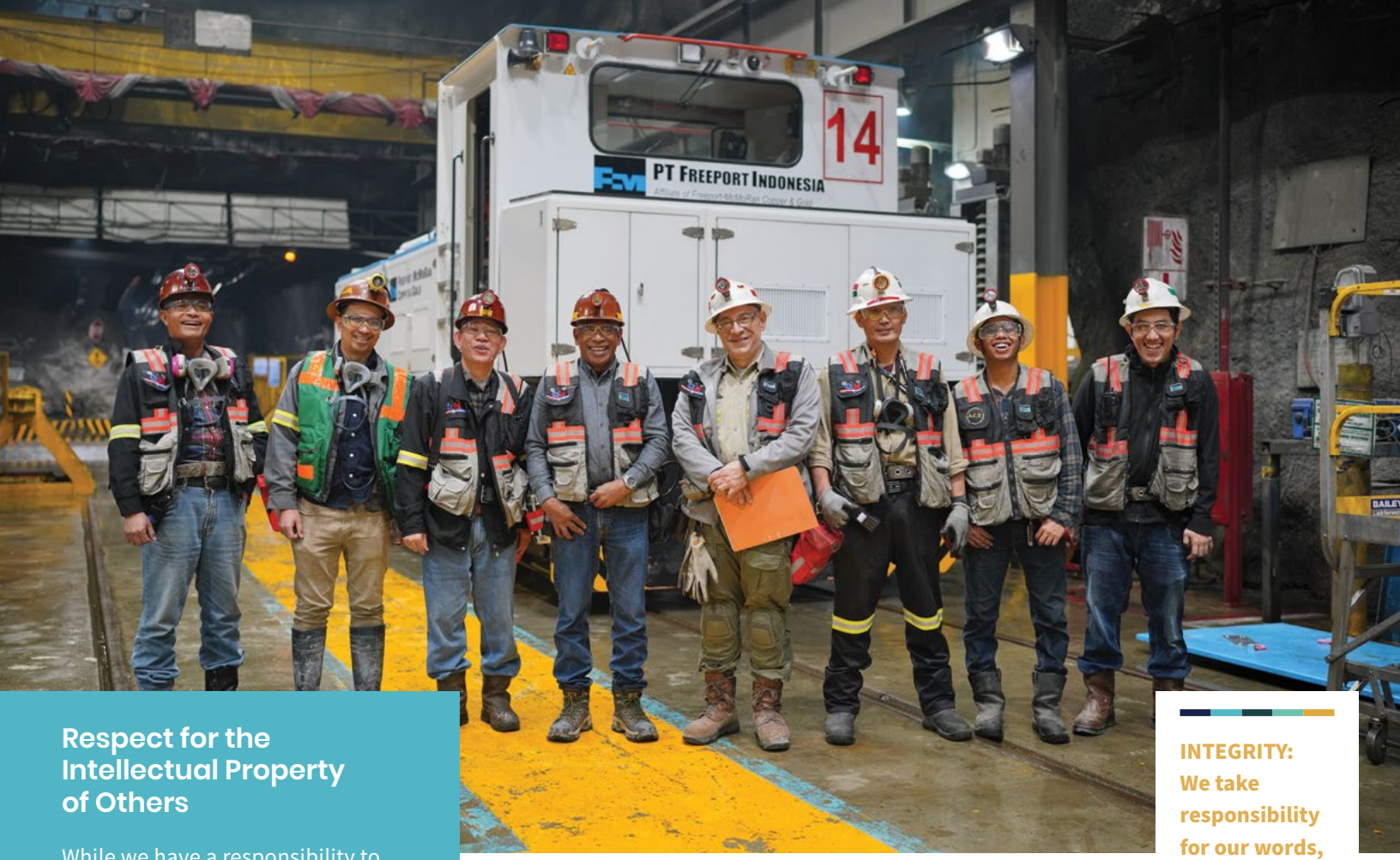
Company records can include:

- Contracts
- Correspondence, including memoranda, letters, email, text messages and attachments
- Personnel files
- Policies and procedures
- Production reports
- Purchase orders and invoices
- Reports, analyses, maps, drawings, plans, schedules, tables, presentations and financial models

Company records come in all formats and media, including:

- Audio or video recordings
- Computer files, databases and email, including attachments
- Paper documents, including correspondence, engineering drawings, architectural plans, charts, records, sketches and maps
- Photographs, prints and electronic media files

EXCELLENCE:
We work with purpose to deliver high-quality results.



Respect for the Intellectual Property of Others

While we have a responsibility to protect our own Company data, it also is important that we respect other companies' confidential information and intellectual property. If we have authorized access to customer or Supplier confidential information, we must protect it as we would protect our own.

We may, however, access and use publicly shared information, such as presentations or best practices. We need to respect trademarks and copyrighted material and, if using the intellectual property of another, follow all applicable license terms. If you have questions about using intellectual property associated with another company's patents, you should consult the Legal department. Requesting or accepting the confidential information of another company without consent is prohibited and may have legal consequences.

INTEGRITY: We take responsibility for our words, actions and decisions.

Protecting Our Confidential Information and Intellectual Property

Our strategic thinking, creativity and innovative ideas make significant contributions to the Company's continued success in the marketplace. We must protect and use responsibly our confidential information and intellectual property, which include but are not limited to:

- Exploration plans
- Business objectives
- Unpublished financial information
- Computer programs and related documentation
- Customer, Supplier, contract and pricing information
- Operating plans
- Reserve information that has not been made public
- Research, processes, formulas and technical data
- Trade secrets and patent applications

Those who have access to FCX confidential information and intellectual property are obligated to safeguard it from unauthorized access. Any information and intellectual property created during your employment belongs to the Company.

WHAT WE DO:

- Refer to the Company's Disclosure Policy and get approval before releasing any FCX confidential information or third-party information FCX has received in confidence, outside the Company
- Exercise caution when discussing Company business in public places where conversations can be overheard, such as restaurants, elevators and airplanes
- Exercise caution when using electronic devices, such as laptops or mobile phones, in public places to prevent others from viewing confidential information
- Return all Company equipment and proprietary information in our possession if leaving the Company, never taking any papers or other information
- Continue to protect FCX proprietary and confidential information after we leave the Company

WHAT WE DON'T DO:

- Share proprietary or confidential information, except on a legitimate need-to-know basis
- Use proprietary information for personal benefit or the benefit of persons outside FCX
- Provide our password(s) to anyone for any reason, except as provided by the MIS End User Policy

For more information, please see our Disclosure Policy, External Communications Policy, GSC Policy and MIS End User Policy on FM Web.

Any information created during your employment belongs to the Company.

EXCELLENCE: We take pride in our work and always do our best.

Protecting Company Assets

We all have an obligation to be prudent about spending Company money and protecting all our Company's assets from loss, damage, misuse, theft, unauthorized or improper use, or waste. We also have a responsibility to report misuse or abuse of our property by others to management.

Company assets include our physical assets (such as computers, vehicles and equipment), financial assets (money, corporate credit cards), information (nonpublic data about FCX's business) and intangible assets (such as ideas, designs and intellectual property).

Electronic messages also are FCX property when sent or received using any aspect of Company technology or when pertaining to Company business. Email, voicemail, instant messages and text messages are a recoverable, forwardable and potentially permanent record of your communications. Non-company approved ephemeral, text and instant messaging services must only be used for informal communications and should never include sensitive or confidential information.

To the extent permitted by applicable laws, FCX specifically reserves the right to permit Company-approved representatives to monitor, access and review any documents housed in Company systems and to monitor and review use of the Internet, any communications sent or received using Company electronic communication systems, and telephone records, even after the employee has deleted or erased them. All such documents, data and records are the property of the Company and may be used and disclosed by the Company as it sees fit. Employees should not assume that communications made or documents, data or records stored on the Company's electronic systems will be private and not be accessed by the Company.

WHAT WE DO:

- Use good judgment when working with any Company-owned resources
- Take all reasonable steps to ensure Company assets, including portable Company equipment (such as a smartphone, laptop or vehicle), are not damaged, abused, wasted, lost or stolen
- Carefully compose electronic messages, keeping in mind that messages will become a permanent record and a reflection of the Company
- Promptly report any abuse or misuse of Company assets

WHAT WE DON'T DO:

- Remove Company-owned property from FCX work locations for personal use without express prior approval
- Use Company-paid contractors to perform work at home or for other personal benefit
- Use Company assets in unauthorized ways or for inappropriate or illegal activity
- Use the Company email or computer network to send or access discriminatory, offensive, defamatory, or pornographic messages or materials
- Knowingly post or transmit any software containing a virus

For more information, please see our MIS End User Policy on FM Web.

Employees should not assume that communications made or documents, data or records stored on the Company's electronic systems will be **private** and not be accessed by the Company.

Use Of Company Communication Systems

While we are at work, we are expected to be fully engaged and not undertaking personal activities. All FCX communication equipment systems, such as our phones and computer networks, are Company property and are intended, like all other Company assets, for business use. The contents of communications over those systems—like email, voicemail, texts and other electronic messages—also are Company property.

Strength in Values: Our Market

At FCX, we strive to preserve our reputation as a company that can be trusted to deal honestly and transparently everywhere we do business. We compete fairly and in accordance with the highest ethical standards and all applicable competition laws. We believe in free and open competition and do not participate in any type of unfair business practices; that is, any type of advertising or business solicitation likely to deceive or prejudice any customer.

INTEGRITY:
We are honest, transparent and responsible when dealing with competitors and customers.

Promoting Fair Competition

The United States, the European Union, countries in the Asia-Pacific region and South America, and many other nations have laws and regulations that prohibit agreements or actions among competitors that might restrain trade or reduce competition. Known as antitrust laws in the United States and competition laws or anti-monopoly laws elsewhere, these laws are designed to encourage competition and promote a fair market for doing business.

However, these laws are complex, vary from country to country and cause serious legal consequences for employees and companies if violated. It is critical we avoid even the appearance of an agreement to engage in any prohibited activity with a competitor or customer.

In addition to specific interactions with competitors and customers, other activities can create the risk of violating competition laws, such as collecting competitive information and benchmarking activities.

Collecting Competitor Information and Benchmarking Activities

It is appropriate for the Company to keep up with competitive developments and to review all pertinent public information about our competitors. However, we cannot attempt through improper means to acquire a competitor's trade secrets or other commercially sensitive information—such as proprietary or confidential information relating to pricing, production plans, capacity or costs, market share, bids and contract terms, or customers.

As good corporate citizens, we engage in group activities related to safety, environmental and human rights issues, and similar activities. When benchmarking activities involve competitors or potential competitors, no commercially sensitive information may be shared.

WHAT WE DO:

- Limit our contact with competitors
- Avoid situations where competitors start discussing future pricing, competitive initiatives, production or other commercially sensitive information that might appear to restrain trade
- Treat our customers fairly and equally, and honestly and accurately describe what we do or sell
- Exercise caution when participating in trade association, joint venture and benchmarking activities, as even casual conversations can violate competition laws
- Seek advice from the Legal department before entering into any kind of agreement with a competitor

WHAT WE DON'T DO:

- Discuss or enter into an agreement with a competitor to fix prices, rig bids, divide up markets, force another competitor or a market out of business, or agree to boycott a customer or Supplier
- Provide, ask for or trade commercially sensitive information with competitors
- Make false statements or disparaging remarks about our competitors or their products and services
- Make inaccurate or dishonest claims about our own products and services
- Share commercially sensitive information with joint venture partners, unless it directly relates to the business of the joint venture

For additional information, please see our *Fair Competition Guidelines* on FM Web.

It is critical we avoid even the appearance of an agreement to engage in any prohibited activity with a competitor or customer.

Responding to Inquiries from Investors, Analysts and the Media

As a public company, we have the responsibility to comply with laws regarding fair and timely disclosure of Company information, including the requirements set forth in applicable securities laws. We also have a responsibility to ensure that any information about the Company is accurate and complete—free of misinformation or errors—and presented in a clear manner.

That's why it's important that only authorized individuals speak or provide information to investors, analysts or the media about the Company's plans, projects, strategies and financial information. External communication with these groups requires careful consideration and expert understanding of legal and media issues.

None of us may comment on, or respond to, inquiries or rumors concerning any transaction involving our Company without direct authorization to do so.

Authorized spokespersons for the Company include:

- For media inquiries—those designated as such in the appropriate Communications department
- For inquiries from investors, analysts, the SEC or others outside the Company—our Chairman of the Board, Chief Executive Officer, Chief Financial Officer or the Investor Relations department

We have the responsibility to comply with laws regarding fair and timely disclosure of Company information.

WHAT WE DO:

- Direct all media and investor-related inquiries to the appropriate spokesperson
- Politely decline to comment in response to inquiries or rumors concerning FCX's transactions or intentions
- Immediately report to the appropriate Communications department any actual or potential inadvertent disclosure so the Company can take corrective action

WHAT WE DON'T DO:

- Speak on behalf of the Company to investors, analysts or the media without direct authorization from a lead spokesperson
- Use Company-provided equipment to distribute information about FCX other than as required by our regular job duties
- Use Company computers to post messages to Internet chat rooms, social media sites, news groups or any other similar forum—anonymously or under our own name—without direct authorization from a lead spokesperson

INTEGRITY: We communicate openly and accurately, inside and outside the Company.

For a listing of lead spokespersons and more information, please see our External Communications Policy on FM Web.

Engaging in Social Media Responsibly

Social media—networking sites, video/photo sharing, blogs, podcasts, forums and others—is a very powerful form of communication. Such communication is increasingly being used by consumers, investors and other audiences to share opinions and seek information.

If we choose to use social media personally, we do so the right way. To protect the integrity of the Company, we do not:

- Identify ourselves as a Company representative without authorization from a lead spokesperson
- Speak or act on the Company's behalf without authorization
- Create the impression that our personal opinions are those of the Company
- Disclose sensitive, proprietary, confidential or financial Company information, other than what's publicly available
- Post Company news and/or events in advance of an announcement or press release
- Use the Company's logo online for commercial use
- Approve vendor reference to FCX or any of its operations in their communications without authorization from a lead spokesperson

Avoiding Insider Trading

We each have access to information about the Company as a result of our daily responsibilities. Often that information, or inside information, is something an investor would consider when making investment or trading decisions.

Inside information can be about FCX—for example, that we are expanding or reducing operations or about to announce a major change in strategy. It also can be information about a vendor, customer or other third party.

While in possession of inside information, we cannot buy or sell Company stock or the stock of our business partners. Similarly, we cannot provide inside information to anyone or even suggest to anyone that it might be a good time to buy or sell such stock, based on inside information.

If you have access to inside information and have questions about making a trade or sharing information, contact a member of the Legal department.

Examples of Inside Information

Examples of inside information include unpublished:

- Company financial results and dividends
- Decisions to open, close, expand or reduce operations at a facility
- Exploration plans and nonpublic reserve information
- Mergers, acquisitions or sales of specific business units

WHAT WE DO:

- Prevent inside information from being disclosed to people outside the Company
- Follow Company policy for handling, using and disclosing our confidential information and intellectual property
- Only share the information with those inside the Company who truly need to know it to perform their job duties
- Immediately report any inside information that mistakenly has been disclosed to others

WHAT WE DON'T DO:

- Buy or sell Company stock or the stock of our business partners based on inside information
- Provide inside information to others so they can buy or sell stock (called tipping)
- Talk about inside information with family or friends, or discuss it in public or on social media

For more information, please see our Insider Trading Policy on FM Web.

Adhering to International Trade Regulations

INTEGRITY:
We do what we say we will do.

We are a global company, working in communities around the world. That global focus requires us to know and comply with laws that restrict international trade. Trade control laws ensure we follow the foreign policy and national security objectives of countries in which we operate. Serious penalties—fines, revocation of export licenses, and customs inspections and delays—can apply when these laws are broken. In addition, violation of trade control laws can undermine the stated objectives of our host countries and the Company's reputation.

If your work involves selling or shipping products, technologies or services across international borders, make sure you keep up to date with the rules that apply and check with your supervisor or the Legal department if you are unsure. Some of the activities trade control laws govern include:

- **Export and import controls.** These controls are laws that regulate the movement of goods across national borders. They frequently require that we follow specific guidelines, receive the proper approvals, and pay duties and taxes on items being transported from one country to another.
- **Economic trade sanctions.** These laws restrict trade with particular countries, individuals or entities. The U.S. and other countries maintain a public list of prohibited countries and restrictions. To ensure compliance, FCX has developed procedures that require regular screening of customers and Suppliers against government lists of sanctioned parties.
- **Illegal boycotts.** U.S. law prohibits companies from complying with international boycotts that are not approved by the U.S. government. Any employee who receives a request to participate in a boycott or other prohibited trade practice must immediately contact the FCX Compliance department. The Company is required by law to report any requests to participate in, or provide information in support of, an unsanctioned boycott, even if such requests are declined.
- **Money laundering.** Money laundering is when individuals or entities move funds obtained through criminal activities through the financial system to hide traces of their criminal origin, or otherwise enter into transactions to make these funds look legitimate. FCX does not tolerate or facilitate money laundering.

WHAT WE DO:

- Comply with all laws and Company policies regarding international trade restrictions and anti-boycott laws
- Report any requests to engage in boycotting activity
- Report concerns about any payments or the integrity of any customer or Supplier
- Ask if we have questions or are unsure about international trade laws

WHAT WE DON'T DO:

- Import or export prohibited goods or information
- Conduct business with sanctioned countries, companies or people

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

Strength In Values: Our Stakeholders

The natural resources we develop and deliver are the building blocks of infrastructure, critical elements of progress and fuel for the global economy. Responsible management of these resources and strong stakeholder partnerships are critical to how we create value and contribute to sustainable development in the countries and communities where we operate.

FCX is committed to minimizing and mitigating the adverse impacts of our operations and maximizing long-term benefits for local communities and governments. This means partnering to develop sustainable development programs that address high-priority needs and contribute to their enduring success. It also means a commitment to manage environmental aspects at each operation.

To be successful, we know we must proactively and openly engage stakeholders and work together. Our policies, management systems and practices help us do this and drive our continuous improvement over time.

For more information about our sustainability programs and approach, please see the Company's *Annual Report on Sustainability* on fcx.com.

Contributing to Our Communities

We recognize that our operations can have both positive and negative economic, social and environmental impacts on local communities throughout their life span. Some of these impacts include land use changes and population influx, while others include economic opportunities and development in the areas of infrastructure, health and education.

We develop positive relationships in our communities and engage openly and transparently with our stakeholders to operate and grow our business. In each of the areas where we operate, we collaborate with communities to minimize and mitigate adverse impacts and cultivate opportunities to maximize benefits.

We maintain formal stakeholder engagement programs near our operations, some of which include community partnership panels, roundtables, community offices and liaison officers, and community investment funds. Our operations also use a community grievance management system for recording, investigating, responding to and resolving community concerns.

From integrated malaria control and agri-business programs at PT Freeport Indonesia to water treatment plants in Peru to the worldwide DreamBuilder small business training program, we are partnering with communities to work towards resilience and sustainability.

WHAT WE DO:

- Engage openly and transparently with stakeholders—including employees, community members and government officials—on issues that could positively or negatively impact areas where we operate
- Work to build trust within communities
- Implement, in partnership with communities and local governments, social investment programs to address priority needs and facilitate local capacity building
- Respond to concerns or grievances raised by local communities or other stakeholders
- Seek to address and respect the needs, cultures and customs of local indigenous communities near our operations
- Seek to gather appropriate information, data and feedback through social baseline studies and/or impact assessments that best help us understand potential impacts of our projects

WHAT WE DON'T DO:

- Make decisions that actually or potentially impact communities without consideration for our stakeholders or people affected by our projects
- Make commitments to provide Company funds or resources without prior approval

For more information, please see our Social Performance Policy on FM Web.

To be successful, we know we must proactively and openly engage stakeholders and work together to continuously improve.

Values in Action

Q: Micah directs a supplier to the appropriate area at the site to unload heavy equipment. When the supplier crew exits the vehicle and begins to unload, Micah notices one of the crew members appears to be a teenager. He is concerned that this person is under the legal working age. Even though the child is working for a vendor and not for Freeport, he decides to report his concern to management.

Did Micah make the right decision?

A: Yes. Micah absolutely made the right decision. It is everyone's responsibility to ensure Freeport's work environment upholds the Company's commitment to respecting human rights and worker safety, including business partners. Any concerns about human rights violations or unsafe work practices should be reported to the local Human Rights Compliance Officer or through the FCX Compliance Line.

Respecting Human Rights

FCX is dedicated to the recognition, respect and promotion of human rights wherever we do business. We respect internationally recognized human rights, including the rights under the International Bill of Human Rights, and are committed to implementing the United Nations Guiding Principles on Business and Human Rights. We promote human rights awareness through engagement with host governments and local communities as well as providing training to employees and contractors.

Our PBC and core policies, such as the Responsible Sourcing of Minerals Policy, support the application of our Human Rights Policy. These policies and supporting management systems, along with relevant external standards and initiatives (such as the Voluntary Principles on Security and Human Rights), guide our management of human rights risks. We maintain grievance mechanisms for employees, community members, value chain stakeholders and others to record and address human rights issues and concerns.

WHAT WE DO:

- Treat everyone in and around our operations with dignity and respect
- Work to prevent and/or mitigate adverse impacts to stakeholders and provide access to remedy when our activities cause or contribute to adverse impacts
- Report any acts that may violate human rights
- Engage business partners who share our commitment to respecting human rights

WHAT WE DON'T DO:

- Tolerate discrimination in any aspect of our activities
- Tolerate human rights abuses, such as human trafficking; forced, compulsory or child labor; and unsafe or unfair treatment and work conditions
- Look the other way when we see or suspect human rights violations
- Retaliate against anyone who in good faith raises a question or concern about our business practices or reports a human rights violation

For more information, please see our Human Rights Policy on FM Web.

RESPECT:
We treat each other and our stakeholders with respect.

Protecting the Environment

We recognize that mining impacts the natural environment. We conduct our operations in a manner that minimizes adverse impacts on the environment and supports protection of ecosystems where we operate.

We review and evaluate the environmental effects of our activities through the mining and processing lifecycle. We plan and conduct our operations in a manner that seeks to optimize the economic use of our resources while minimizing adverse environmental effects, with a focus on climate, water, biodiversity, air, tailings, waste, mine closure and reclamation.

COMMITMENT:
We conduct our operations in a manner that minimizes adverse impacts on the environment and supports protection of ecosystems where we operate.

WHAT WE DO:

- Comply with all applicable environmental laws and regulations
- Continually improve environmental performance at operating sites through the implementation of ISO 14001 management systems
- Educate and conduct training for our employees and contractors to carry out tasks in an environmentally responsible manner
- Implement critical controls relating to environmental hazards and report incidents to our supervisor or the site-specific Environmental department

WHAT WE DON'T DO:

- Ignore the inherent environmental risks of our business
- Tolerate carelessness in environmental matters
- Falsify information on any environmental monitoring or sampling reports

We recognize that mining impacts the natural environment.

For more information, please see our Environmental Policy on FM Web.

INTEGRITY:
We are honest, transparent and responsible.

Fighting Bribery and Corruption

At FCX, our business relationships are based on our core value of Integrity—being honest, transparent and responsible. We 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 promises or transfers of anything of value may be made to a government official, or an individual or entity affiliated with a government official, that are not consistent with our policies and applicable laws, properly authorized according to our internal procedures, properly accounted for, and clearly and accurately identified on the Company's books and records. If you are asked to make an improper payment or account for a transaction in an incorrect manner, or become aware of any transaction that may involve an improper payment, report it promptly to one of our Compliance Officers.

Keep in mind that payments include the offer, promise to pay or authorization of payment, as well as the actual payment or transfer, of anything of value on behalf of the Company to a government official or others. They also include payments to a third party who, in turn, is likely to transfer that payment to a government official or others.

The Company has a comprehensive anti-corruption compliance program, which includes detailed policies and procedures regarding authorizations and recordkeeping for specific categories of transactions, including travel expenses, charitable contributions, gifts and entertainment, and other payments to governments and government officials. Before you incur any of these types of expenses, please be sure to check our anti-corruption compliance policies as well as local approval procedures.

FCX prohibits facilitating payments. Facilitating payments are payments made to help ensure that public officials perform nondiscretionary tasks they are supposed to perform as part of their normal job function (such as visa processing, providing utility service, and issuing routine licenses or permits to which you are legally entitled).

For additional information, please see our Anti-Corruption Policy and Anti-Corruption Guidelines on FM Web.

Corruption Red Flags: Things to Watch for when Working with Third Parties

Prior to entering a business venture, be on the alert if the proposed partner:

- Refuses to sign anti-corruption certifications and guarantees included in their contract
- Lacks the necessary financial means or qualifications to do the job
- Has been recommended by a government official
- Has a reputation for bypassing normal business channels, particularly in activities involving the government
- Requests approval of a significantly excessive operating budget or unusual expenditures
- Insists on financial terms that are unduly generous in light of their work

Issues that are identified early and approached thoughtfully often can be resolved without jeopardizing our integrity, transparency and business interests.

WHAT WE DO:

- Contact our local Compliance Officers before promising, offering or providing anything of value, including employment offers, gifts, meals and/or entertainment, to a government official, a Supplier affiliated with an official, or an official's family member
- Seek and obtain necessary approvals in a timely manner
- Keep accurate and complete records so all payments are adequately detailed
- Conduct due diligence on all potential business partners

WHAT WE DON'T DO:

- Provide anything of value to a government official in an attempt to improperly influence a decision
- Make payments or offers to government officials through third parties we could not make ourselves
- Circumvent the Company's internal controls by seeking required approvals after a transaction has occurred

At FCX, our business relationships are based on our core value of Integrity—being honest, transparent and responsible.

Participating in Political Activities

Playing an active role in the political process is an important right and responsibility we all share as citizens of a democracy. FCX encourages employees to register, vote and stay informed on political matters important to the success of our business and our communities.

If you participate in political activities, you must use your own time and resources and make it clear that your actions and political views are your own and not the Company's. For example, you cannot engage in personal political activities during paid working hours, use Company resources (such as email, phones and meeting rooms) or place political signs in the workplace.

The Company recognizes that public policy decisions can greatly impact our operations and future business opportunities. Through lobbying activities, we share information and views on issues of public concern that have an important impact on FCX. Lobbying is aimed at influencing public policy decisions by providing information to elected or appointed officials and their staff and is strictly regulated by host governments. Only authorized employees may contact government officials and staff, or otherwise direct lobbying activities.

FCX does not contribute Company funds directly to candidates for public office, political parties or committees organized to fund candidates. The Company does make contributions to nonpartisan voter registration, education and turnout programs.

COMMITMENT:
We engage in opportunities—including political activities—to maximize the benefits our operations deliver.

WHAT WE DO:

- Make it clear that our political views and actions are our own and not those of the Company
- Obtain approval from our local Government Relations department before engaging in political activity or lobbying on behalf of the Company

WHAT WE DON'T DO:

- Use Company resources to support or oppose candidates or initiatives
- Place political signs or similar communications on Company property

How We Uphold The PBC

Investigations

FCX takes reports of alleged PBC violations seriously, no matter how the report is received. We strive to review and resolve each issue quickly, thoroughly and as confidentially as possible. We do this at a local level unless we believe the situation requires otherwise. Human Resources matters may be referred to the local Human Resources representative, accounting issues to the local controller and safety issues to the local safety manager. Depending on the situation, investigations may be conducted by the Compliance department, the Legal department or outside counsel.

Cooperating with an Investigation Process

You may be asked to participate in the investigation of an incident that has been reported by a fellow employee, Business Partner or community member. Participating in an investigation does not mean that you are in trouble or that anyone has reported a concern about you directly. It just may mean that you were a witness to an event or may, because of your position, have information required to investigate a reported concern. If you are involved in an investigation, you are expected to cooperate fully and be truthful, honest and forthright. Failure to do so may result in disciplinary action up to and including termination of employment.

Disciplinary Actions

FCX is committed to doing what is right, and as an employee, you are responsible for upholding this commitment. This means complying with the PBC, Company policies and laws as well as reporting possible violations. Failure to do so could result in disciplinary action up to and including termination of employment.

Reporting a violation of our PBC, Company policy or the law does not absolve you from accountability for personal involvement in any wrongdoing or work performance. It may, however, be considered as a factor in your favor when reviewing possible disciplinary action.

Waivers

FCX does not expect to grant any waivers to these Principles of Business Conduct. However, waivers of any provisions for employees, executive officers or members of the Board of Directors may be made only by the Board of Directors or an authorized committee of the Board of Directors. Any such waivers will be disclosed promptly as required by applicable law. All other waivers must be approved by FCX General Counsel.

FCX does not tolerate retaliation against anyone making a good faith report or participating in investigations involving the PBC.

When You Contact the FCX Compliance Line

- You will be able to provide the details of your report through the Compliance Line web portal or by telephone. The more details you provide, the more thorough the investigation.
- You will receive a report key and password which will let you log back into the system online or call to receive updates on your report.
- Be sure to check back regularly to see if additional information has been requested.
- You will be notified once the investigation has been completed and the appropriate action taken.

When we speak up, we find strength in our values. Speak up immediately if something doesn't feel right or violates, or possibly could violate, the PBC or the law.

The Importance of Speaking Up

Each of us has a responsibility to report suspected violations of the PBC, our policies, procedures or the law to the appropriate personnel as quickly as possible. This allows that any issues are addressed and resolved in a timely manner. We have an open-door culture; we all should feel free to openly discuss any questions or concerns about the way we conduct business. This open communication is vital to our growth as employees, a team and a company.

Reporting Possible Violations and Getting Help

If you ever suspect that a policy has been violated, have a question about a policy or practice, or have a suggestion on how to improve things, we encourage you to discuss it with your supervisor or local Human Resources representative first. They usually are the best individuals to address issues quickly and efficiently.

If you are not comfortable going to your supervisor or local representatives, you have other options.

No Tolerance for Retaliation

FCX will not tolerate retaliation against any employee for raising a question or concern about the Company's business practices in good faith or for using the FCX Compliance Line or cooperating in the investigation of such a concern.

Reports made that are knowingly false are prohibited by this policy.

Any employee who the Company determines has engaged in retaliatory conduct or knowingly filed a false report may be subject to disciplinary action up to and including termination of employment.

If you believe you have experienced any retaliation because you raised a question or a concern or participated in an investigation, you should report that concern immediately using one of the methods described on page 43.

Contacting the FCX Compliance Line

The FCX Compliance Line is operated by a third party and is available 24 hours a day, seven days a week online or by phone. You can submit reports and remain anonymous if preferred, but keep in mind we may not be able to properly investigate concerns if we do not receive enough information.

Online Reporting

Reports can be submitted to the FCX Compliance Line online at *fcxcompliance.ethicspoint.com*. You will be able to log back into the system to view your report, add information and respond to any questions the Compliance team may have posted to your report.

Telephone Reporting

When submitting a report by phone, you will be connected with an independent telephone representative who speaks your primary language. At the end of the call, the representative will repeat the report back to you for clarification and will provide a report key and password so you can call in to check the status of or update your report.

Country	Number
Canada	800-295-6783
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

Resources

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

- Talk with your supervisor
- Talk with your local or corporate Human Resources representative
- Talk with your local or corporate Legal department
- Call or visit your local or corporate Compliance Officer
- **Contact the Compliance department by email:** compliance@fmi.com
- **Contact the Chief Compliance Officer:**
  - +1-602-366-7550
  - Compliance_Officer@fmi.com
- **Contact the FCX Compliance Line online:** *fcxcompliance.ethicspoint.com*
- **Send information by mail to:**
  Compliance Department
  Chief Compliance Officer
  4340 E. Cotton Center Blvd.
  Suite 110
  Phoenix, Arizona 85040
  United States

Scan QR code to report a concern online

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