

	CORPORATE REGULATION ON DONATIONS	CODE	VERSION
		GEN-FIN-NC-001	01
		START DATE OF VALIDITY	END DATE OF VALIDITY
		11/01/2020	12/31/2022
MANAGEMENT IN CHARGE	CORPORATE FINANCE MANAGEMENT		
ELABORATED BY	CHECKED BY	APPROVED BY	
Mariella Ferrero Ghislieri	Patricia Gastelumendi Lukis	Mariela García de Fabbri	
SOCIAL RESPONSIBILITY MANAGER	FINANCE MANAGER	GENERAL MANAGER	

1. Objective:

To establish and disseminate the guidelines under which the Corporation and its subsidiaries make donations, the criteria for selecting beneficiaries, as well as the levels of authorization and those responsible for managing the annual donations program.

2. Scope:

This corporate policy applies to the Ferreycorp corporation, including Ferreycorp S.A.A. and all subsidiaries.

3. Content of the Regulation:

3.1. General information on the Regulation

a. Ferreycorp and its subsidiaries identify themselves as an agent of change whose purpose is to bring development and well-being to the countries and societies in which they operate, and seek to ensure that their social responsibility initiatives are related to their activities and capabilities, in order to make them more sustainable. In this regard, social responsibility actions are prioritized in the following departments:

- Education and culture: Whether by direct execution, through the Ferreycorp Association or in alliance with educational institutions, focusing on specialized technical training for maintenance, repair and operation of machinery, as well as to promote the development of an entrepreneurial, business or professional attitude with a vision of the country's development.
- Health and hygiene: With the objective of improving access to water and sanitation and health care services for a community with limited resources or remote from existing services.

- Values and citizen responsibility: In order to promote citizen and civic values, respect for human rights, responsible citizenship, defense of the environment, and in general to promote the objectives of sustainable development.
 - Development of departments of influence of the company and its customers: Either directly or in alliance with programs of its customers, especially those related to education, health and preferably aimed at young people and / or children and / or communities of scarce and vulnerable resources.
 - Attention in emergency situations: Where the private sector can complement the public sector's efforts; for example, in case of natural disasters, diseases, health emergencies, among others.
 - Volunteering: The volunteer activities of the employees of the corporation and its subsidiaries, in which the company can contribute its organizational and logistical capabilities, and/or provide resources to complement the employees' contributions, as well as minor donations for special dates, such as Christmas.
- b. Social responsibility activities may be carried out directly by the corporation and its subsidiaries, in alliances with third parties, or through donations. In case of donations, these may be provided in terms of money, goods or services.
 - c. In December, Ferreycorp and each subsidiary will approve the donation budget for the following year, establishing a limit of funds with a margin of tolerance for extraordinary contributions. The subsidiaries' budgets must be consolidated in the department of social responsibility to ensure alignment with this regulation, as well as coordination between different initiatives.
 - d. Items not included in the annual budget of each subsidiary may be reviewed later in the year and will be evaluated according to their impact and the availability of funds in the budget.
 - e. Ferreycorp's Social Responsibility department is responsible for the control and follow-up of donations at the corporate level.
 - f. All the companies of the Corporation (national and foreign), as well as its subsidiaries in provinces, are obliged to comply with the provisions of this regulation.
 - g. Any exception to this corporate policy must be approved by Ferreycorp's General Management.

3.2. Indispensable requirements of the receiving entity

- a. The receiving entity of the donation must be an institution with juridical personality, legally constituted and registered in the Public Registry. In

exceptional cases and approved by the general management of the corporation, donations may be made to natural persons.

- b. The receiving entity of the donation must have a recognized prestige and good reputation, in order to ensure the correct use of the donated funds.
- c. Preferably, the receiving entity must be registered as an entity receiving donations with SUNAT.
- d. The receiving entity must have similar values to those of the corporation, especially those related to integrity, seriousness and responsibility in its actions.
- e. The receiving entity must have among its purposes at least one of the causes stated in numeral 3.1 subsection a.

3.3. Prohibitions:

- a. No employee of the Corporation has the authority to offer, commit or make donations on behalf of any of the Corporation's companies without the express authorization of the Corporate Social Responsibility department and/or the corresponding management according to paragraph 3.4, subsection a. of this regulation.
- b. The receiving entity, nor its agents, cannot have a history of corruption or other criminal offenses.
- c. Under no circumstances payments will be made under the concept of donations that may be perceived as or may be used to cover up an improper payment or a corruption crime such as bribery, collusion, influence peddling, money laundering and financing of terrorism.
- d. The direct or indirect beneficiary cannot be a public official or a relative up to the second degree of consanguinity or affinity to a public official. Nor can it be a company, corporation, NGO, Foundation, Committee, non-profit association and/or any type of organization directed by a public official or a relative up to the second degree of consanguinity or affinity of such official.
- e. The Corporation is prohibited from making donations, contributions in cash or in kind, sponsorships, or contributions of any kind in favor of a candidate running for a public office or a political party, in accordance with applicable law (Law No. 28094 - Political Parties Law, and its amendments: Law 28094, Law 30689, among others). These rules prohibit private companies from financing political campaigns, in order to avoid indirectly receiving any benefit or advantage in the future (favor in obtaining the good pro in a bidding process, obtaining a permit,

license or authorization, or in general any special consideration or treatment in their relationship with the public sector).

- f. Under no circumstances cash donations will be made, all cash transactions must be deposited in a bank account in the name of the Beneficiary Entity.

3.4. Procedure

- a. Donation requests may come through different departments (human resources, commercial, etc.) but must always be managed through the department responsible for the management of donations in each company, and must always have the approval of the general management

Corporation	Department responsible for the management of the donation
Ferreycorp	Social Responsibility Department
Ferreycorp	Social Responsibility Department
Unimaq	Social Welfare Department
Orvisa	Social Welfare Department
Soltrak	Social Welfare Department
Fargoline	Risk Prevention Department
Motored	Social Welfare Department
Others	

- b. All donation requests must be approved by the social responsibility department of the corporation in order to verify the alignment with the objectives and the annual budget, as well as the coordination between the different companies. In case a donation request exceeds S/. 5,000 (Five thousand soles and 00/100), it must be approved by Ferreycorp's finance management, and for donations over S/. 10,000, by the corporation's general management.
- c. Donation requests should be addressed to Ferreycorp and/or subsidiary of preference, specifying the following:
- Name of the applicant entity
 - Unique Taxpayer Registry Number
 - SUNAT Resolution that accredits them as a donation receiving entity
 - Amount requested/goods requested

- Brief description of the purpose and reasons for requesting the donation.
- d. The departments responsible for the management of donations in each company, indicated in point 3.4.a, will be responsible for coordinating with the beneficiary entities, from which the following documentation will be required, prior to making the donation:
- SUNAT resolution accrediting them as a donation receiving entity.
 - Power of attorney or resolution of authorization of the legal representative who will sign the donation contract (his or her authority to sign donation contracts or receive donation checks must be explicitly stated).
 - With the documentation required from the beneficiary of the donation, in cases where the amount of the donation exceeds S/. 1,075.00 (One Thousand Seventy Five and 00/100 soles)* or its equivalent in foreign currency, or when the circumstances so require, a donation contract with signatures legalized before a Notary Public must be requested to be signed under penalty of nullity. The contract must contain clauses waiving the company's liability with respect to the use of the contributions, the execution of the project and its consequences.
 - (*) Amount fixed based on 25% of the UIT in force for the year 2021 (S/. 4,400.00), according to article 1624° of the Civil Code.
 - If the donation is in goods, a Donation Delivery Certificate will be requested to be signed, with the details of the institution to which the donation is being delivered, the details of the items donated, and the signatures of the legal representatives of the beneficiary entity and the Corporation/subsidiary. Additionally, an invoice will be issued free of charge indicating the referential value.
 - Certificate of the corresponding donation or Resolution of the state entity approving the donation, once the contribution has been made.
 - In the case of donations to Public Entities, the following must be requested:
 - The internal proceedings of the Public Entity approved for the processing of its donations in order to follow such proceedings.
 - Resolution of acceptance of the donation from the Head or Council Agreement in the case of Regional Governments and from the Municipal Council in the case of Local Governments (Municipalities).
 - In the case of donation of goods, request the signature of a Delivery Act by the representative of the Public Entity.
 - An attempt will be made to sign a Donation Agreement; however, the Public Entity may consider not signing it if this is not established in its Internal Procedure.
 - In the case of donations from subsidiaries located outside Peru, it will be necessary to have all documents in accordance with the donation regulations of each country.

- o The Corporation reserves the right to request any additional information to that previously stipulated, as it deems appropriate, in order to approve the donation.
- e. Every three (3) months, the heads of the accounting departments of each subsidiary will be responsible for updating the corporate donations register according to the format established in Annex 01. Ferreycorp's Social Responsibility Department will be responsible for monitoring compliance of this point.
- f. Ferreycorp's Social Responsibility Department will monitor the projects implemented with the companies' contribution, periodically and randomly requesting information or accountability of their use and the impact obtained.
- g. Ferreycorp's Corporate Audit and Compliance Department will randomly supervise the adequate compliance with the parameters indicated in this regulation.

4. Annexes

4.1 Annex 01: Corporate Donation Register



THIS DOCUMENT HAS BEEN AUTHORIZED IN THE REGULATORY SYSTEM BY:

ROLE	NAME	POSITION	DATE
Elaborator	Mariella Ferrero Ghislieri	SOCIAL RESPONSIBILITY MANAGER	Approved - 05/04/2021 14:23
Revisor	Patricia Gastelumendi Lukis	CORPORATE FINANCE MANAGER	Approved - 05/04/2021 14:24
Approver	Mariela Garcia De Fabbri	DIRECTOR	Approved - 05/04/2021 14:35