

	CORPORATE POLICY ABOUT GIVING AND/OR RECEIVING GIFTS, PAYMENTS, FAVORS AND OTHERS	CÓDE	VERSIÓN
		GEN-GCAC-NC-001	04
		INITIAL EFFECTIVE DATE	FINAL EFFECTIVE DATE
		10.01.2019	10.01.2024
PROCESSING MANAGEMENT	CORPORATE AFFAIRS MANAGEMENT		
ELABORATED BY	REVIEWED BY	APPROVED BY	
Eduardo Ramírez del Villar	Eduardo Ramírez del Villar	Mariela García Figari de Fabbri	
CORPORATE MANAGER OF CORPORATE AFFAIRS	CORPORATE MANAGER OF CORPORATE AFFAIRS	GENERAL MANAGER	

1. OBJECTIVE:

This rule seeks to regulate the behavior to be maintained by the directors, managers, officers, employees and other collaborators (hereinafter the "Collaborators") of the Corporation (this concept is to be understood as the company Ferreycorp S.A.A. and its subsidiaries) with respect to the offering of gifts, favors, invitations, commissions, fees, sponsorships, hospitality, travel, entertainment, money or income of any kind, which they may give or receive either within or outside the performance of their duties, and which exceed the rules of courtesy and business standards, in order to avoid improper conduct and acts of corruption.

2. REFERENCE OR CONCORDANCE:

- GEN-GCAC-PC-001 - Corporate Code of Ethics
- GEN-GCAC-PC-002- Corporate Compliance Policy

3. SCOPE:

Applies to all Employees in their business relationships, within or outside the performance of their duties, vis-à-vis customers, suppliers and others.

4. CONTENT OF THE STANDARD:

4.1. Delivery of goods:

According to our Corporate Code of Ethics and in relation to our value **INTEGRITY**, we declare that:

"INTEGRITY

WE COMPLY WITH LAWS AND REGULATIONS

*We develop our work with high ethical standards, acting responsibly in all situations and relationships with our stakeholders. We inform ourselves about the provisions that the corporation must comply with so that our actions and relationships are always within the framework of the law, promoting good practices and fair competition, rejecting all fraudulent and illegal conduct. **We do not engage in dishonest dealings with customers and suppliers in the private sector or with government officials, nor do we use gifts, favors, invitations, commissions, fees, money or payments of any kind to achieve our business goals.***

As a consequence of our commitment to INTEGRITY it is **STRICTLY PROHIBITED** for Employees to pay commissions, fees or money, or cash equivalents (such as securities, money certificates, checks, etc.); as well as giving gifts and presents; or performing favors and invitations (such as: paying for travel, per diem, entertainment, sponsorships, lodging, tips, prizes, discount coupons); giving free use of vehicles, materials, facilities or equipment, whether tangible or intangible, to clients, suppliers, their officers and employees, or others, whether in the public or private sector, with the ultimate purpose of achieving any personal benefit or business goals, even if it is also for the benefit of the Corporation.

The Corporation has a **ZERO TOLERANCE** policy regarding this type of conduct considered improper and incompatible with the values enshrined and promoted by the Corporate Compliance Policy and the Corporate Code of Ethics.

The only exceptions to the above will be made strictly under the following assumptions:

Only for private sector customers and supplier:

1. Direct or indirect delivery of promotional items may be made and must be governed by commercial standards and be minor items such as: miniatures of machinery, hats, polo shirts, etc. with the brands we represent and for amounts that do not detract from objectivity in decision making.
2. Invitations may be extended to clients to national and international events, which generally include tickets, per diem, lodging, entertainment, gratuities, free use of vehicles and materials; these must be offered solely for the promotion, demonstration, or operation of the products and services offered by the Corporation in its commercial activity. In the case of scheduled trips for clients, the procedure shall be carried out in accordance with the regulations in force in each subsidiary.

It should be noted that these invitations to clients must comply, without exception, with generally accepted commercial standards, in order to avoid generating a benefit for the Corporation from the offer, which could damage the Corporation's reputation. When providing scheduled trips for clients, the internal standards governing this matter must be complied with.

In the case of local services to clients in general (business meetings, dinner invitations, etc.), expenses will be reasonable according to the type of service and in accordance with the internal standards of each subsidiary.

In the case of agencies, institutions, companies and other public sector entities, and as long as permitted by the rules and regulations in force of each agency or institution:

- Promotional items may be delivered, having to be governed by commercial standards and be minor items such as: miniatures of machinery, caps, polo shirts, etc. with the brands we represent and for amounts that do not detract from objectivity in decision making.

4.2. Receipt of goods

In accordance with our Code of Ethics and in relation to our value **EQUITY** we declare that:

“EQUITY

WE RELATE TO OUR STAKEHOLDERS

We create reliable and permanent relationships over time with our stakeholders under a perspective of mutual growth. We are based on fair, loyal and transparent treatment, respecting our customers, suppliers and other stakeholders.

*The quality of our services and products, as well as the price and delivery time, are the criteria we prioritize in the relationship with our customers, as well as in the selection of our suppliers, **without accepting retributions that transcend the commercial relationship.***

Purchasing decisions shall be made based solely on the best interests of the corporation under conditions of openness and free competition. Suppliers shall obtain the corporation's preference based on "the quality and proposed conditions of the products or services they offer."

As a consequence of our commitment to Fairness, "Remuneration that transcends the business relationship" is defined in the Code of Ethics as that situation linked to the performance of their activities in which Employees "should not expect any kind of retribution from the Corporation's customers or suppliers, and therefore shall not accept gifts, favors, invitations, commissions, fees, honoraria, money or income of any kind that transcend the rules of courtesy and commercial standards."

It is **STRICTLY PROHIBITED** for Employees to receive commissions, fees or money, or cash equivalents (such as securities, money certificates, checks, etc.); gifts, presents and promotional items; to accept favors and entertainment (such as payment for travel, travel allowances, lodging, entertainment, tips, prizes, discount coupons); to receive free use of vehicles, travel expenses, entertainment, tips, prizes, discount coupons, etc.) to receive free use of vehicles, materials, facilities or equipment, whether tangible or intangible, from clients, suppliers, their officers and employees, or others, whether from the public or private sector, that exceed the rules of courtesy and commercial standards, and are made with the purpose of obtaining any type of benefit or the achievement of personal business goals or for the benefit of the Corporation.

The Corporation has a **ZERO TOLERANCE** policy for this type of conduct, which is considered improper and incompatible with the values enshrined and promoted in the Corporate Compliance Policy and the Corporate Code of Ethics. The direct or indirect receipt of gifts, presents or promotional items is permitted as a matter of courtesy and in accordance with commercial standards, only at times of the year when it is customary to send and receive gifts (Christmas, New Year and National Holidays) or at a special event, anniversary or commemorative date that justifies it, for reasonable and justifiable amounts, except in exceptional cases duly authorized by the corresponding management.

Employees who receive a gift, present or promotional item, the value of which exceeds US\$200.00 (Two Hundred and 00/100 U.S. Dollars), shall:

1. Deliver the gift or present to the Corporate Social Responsibility area in order to incorporate it into their awards and donations program. Sign the Affidavit of Goods and/or Invitations Received, which as Form NCRE- 001 is part of this regulation, and deliver it to the Corporate Ethics and Compliance Officer within five (5) working days of receipt.
2. Gifts, presents or promotional items that do not exceed US\$ 200.00 (Two Hundred and 00/100 U.S. Dollars) shall remain the property of the Employees, without the need for reporting.

Employees who receive a gift, gift or promotional item of less than US\$ 200.00 (Two Hundred and 00/100 U.S. Dollars) from a customer, supplier or third party on a repetitive basis and/or which in the aggregate exceed US\$ 200.00 (Two Hundred and 00/100 U.S. Dollars) shall remain the property of the Employees without reporting. 00 (Two Hundred and 00/100 U.S. Dollars) during the period of one year, they must sign the Affidavit of Goods and/or Invitations Received in Form NCRE- 001, which is part of this regulation, and deliver it to the Corporate Ethics and Compliance Officer within five (5) working days of the situation materializing.

The Corporation, at its discretion, may request all or a group of Employees to sign the Affidavit of Assets and/or Invitations Received (Form NCRE-001) on dates such as Christmas, national holidays, or others, which must be submitted to the Corporate Ethics and Compliance Officer within the requested period.

Employees may only accept invitations to national and international events (fairs, factory visits, anniversary ceremonies, seminars, training, among others) from a third party (Client, supplier or other), if this is required to achieve a better understanding of a product, service or transaction in progress, as long as it is approved by the general management of the subsidiary in which they work. In the event that an Employee receives more than one invitation per year or receives recurring invitations from the same customer, supplier or other, he/she must declare it to the Corporate Ethics and Compliance Officer by means of the Affidavit of Goods and/or Invitations Received (Form NCRE 001).

Invitations and local hospitality **RECEIVED** from suppliers, customers, their officers and employees or others (business meetings, dinner invitations, etc.) within the scope of the business relationship shall not exceed US\$ 200.00 (Two Hundred and 00/100 U.S. Dollars).

In case of exceeding US\$ 200.00 (Two Hundred and 00/100 U.S. Dollars), Employees must report it through the Affidavit of Goods and/or Invitations Received (Form NCRE 001) to the Ethics and Compliance Officer within five (5) working days of receipt.

Likewise, as far as possible, Employees shall refuse invitations or hospitality exceeding US\$ 200.00 (Two Hundred and 00/100 US Dollars). In any case, if it is not possible to refuse the invitation or service, the Collaborator shall assume the cost exceeding US\$ 200.00 (Two Hundred and 00/100 US Dollars).

5. RECORDS

5.1 NCRE – 001 Form

Affidavit of Goods and/or Invitations Received

Information regarding goods received from suppliers, customers, its officers and employees, or others.

Description Of goods Received	From whom It was received	Estimated Value of goods received	Reason for receipt	Other information To be Disclosed

Information regarding invitations received from suppliers, customers, their officers and employees, or others.

Date of The event	Description Of the event	From whom Received The invitation	Value Estimated Of the Expenses Incurred In the invitation	Reason for Receiving The invitation	Other information To be Disclosed

I declare under oath that the information provided is true and accurate.

Subscribed in the city of, _____, on _____ the days of the month _____ of 202_.

Signature: _____

Name: _____

DNI/ID: _____

THIS DOCUMENT HAS BEEN AUTHORIZED IN THE REGULATORY SYSTEM BY:

ROLE	NAME	POSITION	DATE
Developer	Eduardo Ramírez del Villar	CORPORATE MANAGER OF CORPORATE AFFAIRS	Approved - 12/09/2022 18:47
Reviewer	Eduardo Ramírez del Villar	CORPORATE MANAGER OF CORPORATE AFFAIRS	Approved - 12/09/2022 18:51
Approver	Mariela García Figari De Fabbri	GENERAL MANAGER	Approved - 12/09/2022 22:06