

	CORPORATE HUMAN RIGHTS POLICY	CÓDE	VERSIÓN
		FIN-ADMIN-PC-002	01
		INITIAL EFFECTIVE DATE	FINAL EFFECTIVE DATE
		13.07.2021	13.07.2026
PROCESSING MANAGEMENT	CORPORATE FINANCE MANAGEMENT		
ELABORATED BY	REVIEWED BY	APPROVED BY	
Bárbara Pita Dueñas	Patricia Gastelumendi Lukis	Mariela García Figari de Fabbri	
LABOR RELATIONS AND HSE MANAGER	CORPORATE FINANCE MANAGER	GENERAL MANAGER	

1. OBJECTIVE

Establish the guidelines that the corporation's companies must follow to respect and protect human rights, as well as establish the due diligence process to identify, prevent, mitigate and account for how they deal potential human rights impacts in the management of their businesses.

2. SCOPE

This policy establishes our commitments regarding the respect and promotion of human rights, and applies to the Ferreycorp corporation and all its subsidiaries, hereinafter Ferreycorp, to all employees, executives and directors.

The violation of this policy or the performance of any act in violation of this policy will result in disciplinary actions that will be imposed by the human resources area to the employees who have incurred in these infractions.

3. DECLARATION OF RESPECT FOR HUMAN RIGHTS

Ferreycorp and its companies are committed to respecting and protecting the human rights considered in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the International Covenant on Economic, Social and Cultural Rights and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work, ILO fundamental conventions, the Sustainable Development Objectives, among other international standards and conventions on the subject, and this commitment extends to its value chain. Likewise, Ferreycorp and its subsidiaries are aligned with the National Action Plan on Business and Human Rights 2021-2025, approved by Supreme Decree N° 009-2021-JUS, which aims to incorporate international standards on business and human rights so as to ensure respect for human rights in the scope of activities of companies of all sizes and industries.

In addition, Ferreycorp has been a signatory of the United Nations Global Compact since 2004, so the corporation and its subsidiaries are committed to its 10 guiding principles, which entail maintaining and incorporating best practices in relation to respect for human rights, responsible labor, environmental preservation and the fight against corruption.

Ferreycorp's commitment is to respect the dignity of the individual, the principle of equality and non-discrimination based on race, sex, color, nationality or social origin, religion, age, disability, sexual orientation, political opinion, or any other category protected by applicable laws, the right to equal pay, and other conditions between men and women, as well as other conditions of gender equality and inclusion. Ferreycorp prohibits child labor, forced labor and human trafficking, and pays special attention to the rights of potentially vulnerable groups, establishing, if necessary, reasonable adjustments according to law. The corporation protects maternity rights, as well as all rights and leaves derived from pregnancy and breastfeeding, both for the mother and the father.

Ferreycorp also respects the freedom of association and collective bargaining, the elimination of inhuman or degrading treatment, harassment and sexual harassment in the workplace.

Ferreycorp has a policy and strict processes on safe and healthy working conditions, offering a dignified work environment and adopting the necessary measures to avoid minimizing occupational risks in our operation, and respecting the right to rest, free time and vacations.

4. REFERENCES

This policy takes into consideration the United Nations Guiding Principles on Business and Human Rights, within the framework of the National Action Plan on Business and Human Rights 2021-2025, as well as the Code of Ethics and other internal corporate responsibility standards and policies of Ferreycorp.

5. DUE DILIGENCE PROCEDURE

5.1. Risk identification

Ferreycorp has a human rights risk map for its operations.

5.2. Dissemination and training

This policy will be publicly available on Ferreycorp's website, so that the entire value chain and stakeholders with which the corporation and its subsidiaries are related, especially employees and suppliers, are aware of the commitments assumed in terms of human rights.

The corporation will organize training awareness campaigns for its employees and suppliers to promote respect for human rights, as it deems appropriate, taking into account the human rights risk management.

5.3. Reporting channels

In the event of incidents of non-compliance with the guidelines of this policy, all stakeholders of the corporation may make their complaints through the channels established in GEN-GCAC-PRC-010 (Corporate Procedure for the treatment of queries and the management of complaints of the Corporate Compliance System).

Web site: https://www.ferreycorp.com.pe/canal_denuncias/

- E-mail: canaldedenuncias@ferreycorp.com.pe
- Phone: 626-4110.

- Physical mailbox: Jr. Cristóbal de Peralta Norte 820, Santiago de Surco
- Personal interview with the Corporate Ethics and Compliance Officer.

These complaints will follow the same course of review and investigation as stipulated in the procedure mentioned in the preceding paragraph.

5.4. Monitoring and evaluation

Ferreycorp also has a corporate human resources department that establishes guidelines and standards for labor relations and evaluates compliance. In addition, the corporation and its subsidiaries are evaluated for labor compliance by the corresponding regulatory body through random audits conducted at the corporation's different locations, whose incidents and improvement plans are monitored by the labor relations area. The corporation and its companies also participate in external evaluations on labor matters (Asociación de Buenos Empleadores) and sustainability (Distintivo Perú 2021), Good Labor Practices (Ministry of Labor) and Par Ranking (Aequales) in which practices are evaluated in terms of freedom of association and collective bargaining, the right to equal pay for men and women, as well as the prohibition of child labor and forced labor, among others.

An Annual Compliance Report is also issued and approved by the Board of Directors, which shall include a chapter on Human Rights. Mitigation and remediation plans

When required, incidences of non-compliance with this policy will have mitigation and/or remediation plans. Mitigation plans include actions taken to reduce the probability of occurrence of potential negative impacts, while remediation plans include actions to be implemented to restore stakeholders who have been harmed by the activities of the corporation or any of its subsidiaries to the situation they would have been in had the impact not occurred.

The monitoring of such plans will be the responsibility of the areas in charge of overseeing the application of this policy as indicated in point 6.

5.5. Communication and transparency

As of the publication of this policy, Ferreycorp and its subsidiaries companies will report in the Annual Report a summary of the processes implemented to mitigate human rights risks, the number of operations with mitigation plans and the type of remediation actions that have been implemented, when applicable.

Complaints will be received by the ethics officer who, depending on the nature of the complaint, will forward it to the corresponding areas for the solution of the same.

6. COMPLIANCE WITH THE POLICY

Strict compliance with this policy is mandatory for all employees of the Corporation. Likewise, employees who believe that a violation of the principles set forth in this policy may have occurred must report it through the channel for complaints mentioned in point 5.

Contracts with workers, contractors and suppliers include a commitment to respect Ferreycorp's Code of Ethics and, therefore, a commitment to respect this policy. All those involved in the value chain will be held accountable for their conduct while working on behalf of the company, and action will be taken when the Code or this specific policy is not followed. Consequences will depend on how the individual violated the Code's policies and under what circumstances, and could range from a warning to dismissal in the case of employees.

Where non-compliance with a law is found in this context, Ferreycorp also reserves the right to refer the matter to the relevant authorities for further action to be taken with respect to stakeholders.

The overall responsibility for the supervision of this policy lies with the areas related to each stakeholder group with which they relate: Employees: Corporate Human Resources Management and Suppliers: Corporate Finance Management. Likewise, issues related to codes of conduct and channels for complaints: Corporate Management of Corporate Affairs. Inquiries regarding this policy may be directed to the Sustainability and Human Resources departments. We will provide updates on human rights risk management and our progress in this area in our integrated sustainability reporting.

UNIVERSAL DECLARATION OF HUMAN RIGHTS

On December 10, 1948, the United Nations General Assembly adopted and proclaimed the Universal Declaration of Human Rights, the full text of which appears on the following pages. After this historic act, the Assembly requested all Member States to publish the text of the Declaration and to “arrange for its distribution, display, reading and commentary in schools and other educational institutions, without distinction based on the political status of countries or territories”.

PREAMBLE

Whereas recognition of the inherent dignity and of the equal and inalienable rights of all members of the human family is the foundation of freedom, justice and peace in the world, Whereas disregard and contempt for human rights have resulted in barbarous acts which have outraged the conscience of mankind, and the advent of a world in which human beings shall enjoy freedom of speech and belief and freedom from fear and want has been proclaimed as the highest aspiration of the common people, Whereas it is essential, if man is not to be compelled to have recourse, as a last resort, to rebellion against tyranny and oppression, that human rights should be protected by the rule of law, Whereas it is essential to promote the development of friendly relations between nations, Whereas the peoples of the United Nations have in the Charter reaffirmed their faith in fundamental human rights, in the dignity and worth of the human person and in the equal rights of men and women and have determined to promote social progress and better standards of life in larger freedom, Whereas Member States have pledged themselves to achieve, in cooperation with the United Nations, the promotion of universal respect for and observance of human rights and fundamental freedoms, Whereas a common understanding of these rights and freedoms is of the greatest importance for the full realization of this pledge, Now, therefore, The General Assembly, Proclaims this Universal Declaration of Human Rights as a common standard of achievement for all peoples and all nations, to the end that every individual and every organ of society, keeping this Declaration constantly in mind, shall strive by teaching and education to promote respect for these rights and freedoms and by progressive measures, national and international, to secure their universal and effective recognition and observance, both among the peoples of Member States themselves and among the peoples of territories under their jurisdiction.

Article 1

All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood.

Article 2

Everyone is entitled to all the rights and freedoms set forth in this Declaration, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status. Furthermore, no distinction shall be made on the basis of the political, jurisdictional or international status of the country or territory to which a person belongs, whether it be independent, trust, non-self-governing or under any other limitation of sovereignty.

Article 3

Everyone has the right to life, liberty and the security of person.

Article 4

No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms.

Article 5

No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.

Article 6

Everyone has the right to recognition everywhere as a person before the law.

Article 7

All are equal before the law and are entitled without any discrimination to equal protection of the law. All are entitled to equal protection against any discrimination in violation of this Declaration and against any incitement to such discrimination.

Article 8

Everyone has the right to an effective remedy by the competent national tribunals for acts violating the fundamental rights granted him by the constitution or by law.

Article 9

No one shall be subjected to arbitrary arrest, detention or exile.

Article 10

Everyone is entitled in full equality to a fair and public hearing by an independent and impartial tribunal, in the determination of his rights and obligations and of any criminal charge against him.

Article 11

1. Everyone charged with a penal offence has the right to be presumed innocent until proved guilty according to law in a public trial at which he has had all the guarantees necessary for his defense.

2. No one shall be held guilty of any penal offence on account of any act or omission which did not constitute a penal offence, under national or international law, at the time when it was committed. Nor shall a heavier penalty be imposed than the one that was applicable at the time the penal offence was committed.

Article 12

No one shall be subjected to arbitrary interference with his privacy, family, home or correspondence, nor to attacks upon his honour and reputation. Everyone has the right to the protection of the law against such interference or attacks.

Article 13

1. Everyone has the right to freedom of movement and residence within the borders of each State.
2. Everyone has the right to leave any country, including his own, and to return to his country.

Article 14

1. Everyone has the right to seek and to enjoy in other countries asylum from persecution.
2. This right may not be invoked in the case of prosecutions genuinely arising from non-political crimes or from acts contrary to the purposes and principles of the United Nations.

Article 15

1. Everyone has the right to a nationality.
2. No one shall be arbitrarily deprived of his nationality nor denied the right to change his nationality.

Article 16

1. Men and women of full age, without any limitation due to race, nationality or religion, have the right to marry and to found a family. They are entitled to equal rights as to marriage, during marriage and at its dissolution.
2. Marriage shall be entered into only with the free and full consent of the intending spouses.
3. The family is the natural and fundamental group unit of society and is entitled to protection by society and the State.

Article 17

1. Everyone has the right to own property alone as well as in association with others.
2. No one shall be arbitrarily deprived of his property.

Article 18

Everyone has the right to freedom of thought, conscience and religion; this right includes freedom to change his religion or belief, and freedom, either alone or in community with others and in public or private, to manifest his religion or belief in teaching, practice, worship and observance.

Article 19

Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers.

Article 20

1. Everyone has the right to freedom of peaceful assembly and association.
2. No one may be compelled to belong to an association.

Article 21

1. Everyone has the right to take part in the government of his country, directly or through freely chosen representatives.
2. Everyone has the right to equal access to public service in his country.
3. The will of the people shall be the basis of the authority of government; this will shall be expressed in periodic and genuine elections which shall be by universal and equal suffrage and shall be held by secret vote or by equivalent free voting procedures.

Article 22

Everyone, as a member of society, has the right to social security and is entitled to realization, through national effort and international co-operation and in accordance with the organization and resources of each State, of the economic, social and cultural rights indispensable for his dignity and the free development of his personality.

Article 23

1. Everyone has the right to work, to free choice of employment, to just and favourable conditions of work and to protection against unemployment.
2. Everyone, without any discrimination, has the right to equal pay for equal work.
3. Everyone who works has the right to just and favourable remuneration ensuring for himself and his family an existence worthy of human dignity, and supplemented, if necessary, by other means of social protection.
4. Everyone has the right to form and to join trade unions for the protection of his interests.

Article 24

Everyone has the right to rest and leisure, including reasonable limitation of working hours and periodic holidays with pay.

Article 25

1. Everyone has the right to a standard of living adequate for the health and well-being of himself and of his family, including food, clothing, housing and medical care and necessary social services, and the right to security in the event of unemployment, sickness, disability, widowhood, old age or other lack of livelihood in circumstances beyond his control.
2. Motherhood and childhood are entitled to special care and assistance. All children, whether born in or

out of wedlock, shall enjoy the same social protection.

Article 26

1. Everyone has the right to education. Education shall be free, at least in the elementary and fundamental stages. Elementary education shall be compulsory. Technical and professional education shall be made generally available and higher education shall be equally accessible to all on the basis of merit.
2. Education shall be directed to the full development of the human personality and to the strengthening of respect for human rights and fundamental freedoms. It shall promote understanding, tolerance and friendship among all nations, racial or religious groups, and shall further the activities of the United Nations for the maintenance of peace.
3. Parents have a prior right to choose the kind of education that shall be given to their children.

Article 27

1. Everyone has the right freely to participate in the cultural life of the community, to enjoy the arts and to share in scientific advancement and its benefits.
2. Everyone has the right to the protection of the moral and material interests resulting from any scientific, literary or artistic production of which he is the author.

Article 28

Everyone is entitled to a social and international order in which the rights and freedoms set forth in this Declaration can be fully realized.

Article 29

1. Everyone has duties to the community in which alone the free and full development of his personality is possible.
2. In the exercise of his rights and freedoms, everyone shall be subject only to such limitations as are determined by law solely for the purpose of securing due recognition and respect for the rights and freedoms of others and of meeting the just requirements of morality, public order and the general welfare in a democratic society.
3. These rights and freedoms may in no case be exercised contrary to the purposes and principles of the United Nations.

Article 30

Nothing in this Declaration may be interpreted as implying for any State, group or person any right to engage in any activity or to perform any act aimed at the destruction of any of the rights and freedoms set forth herein.

THIS DOCUMENT HAS BEEN AUTHORIZED IN THE REGULATORY SYSTEM BY:

ROLE	NAME	POSITION	DATE
Developer	Barbara Pita Dueñas	LABOR RELATIONS AND HSE MANAGER	Approved - 07/13/2021 13:02
Reviewer	Patricia Gastelumendi Lukis	CORPORATE FINANCE MANAGER	Approved - 07/13/2021 13:15
Approver	Mariela García Figari De Fabbri	GENERAL MANAGER	Approved - 07/13/2021 14:41