

	CORPORATE STANDARD ON THE CONTROL OF REPUTATIONAL AND CORRUPTION RISKS IN BUSINESS WITH THIRD PARTIES	CODE	VERSION
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MANAGEMENT ELABORATING	CORPORATE AFFAIRS CORPORATE MANAGEMENT		
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1. OBJECTIVE

This corporate standard establishes the policies, procedures and internal mechanisms that will allow the directors (when applicable), managers, officers, employees and other personnel of the corporation (hereinafter the “Employees”) to identify the risks to which Ferreycorp S.A.A. or any of its subsidiaries (hereinafter referred to collectively as the “Corporation”), in its relations and business with third parties, seeking to prevent, through compliance with the procedures and policies described below, being involved in any corruption or in the commission of any related or related crime.

Relationships with third parties are understood as: i) the relationship with clients in the usual commercial operations, ii) the formation of alliances or partnerships when undertaking a new business, iii) the total or partial acquisition of existing companies or their assets, iv) the purchase of goods, and v) the contracting of services from third parties.

In this regard, the ability to detect, know and investigate the background of third parties with whom the Corporation seeks to interact, both at the time of evaluating the beginning of a relationship and throughout the relationship, especially with regard to possible acts of corruption in which they are or may be involved, is a fundamental issue that must be complied with by all Employees.

The compliance procedures or controls to be followed are based on the general principle of “know your customer” or “know your client”, today extended to the principle of “know your partner” or “know your supplier”, which demands to know our counterpart (client, partner or supplier) in any current or future business to be carried out. This standard seeks to ensure that the employees of the Corporation apply due diligence standards when carrying out their business activities, with special emphasis on the managers, supervisors and chiefs who approve such activities and transactions.

2. SCOPE OF APPLICATION

This corporate standard applies to all Employees in the development of commercial activities with third parties. Third parties are defined as any natural or legal person other than the Corporation itself or its Employees, such as clients, partners, allies, owners of assets in general, suppliers of goods and services in general (lawyers, notaries, advisors, consultants and specialists, accountants, auditors, carriers, customs agents, IT services, advertising, cleaning, surveillance, processors, managers, and the like), among others.

In the event that the Corporation hires them, they must be duly registered as clients in the CRM or as suppliers in the “Suppliers Registry” or in any other registry that the Corporation may implement over time for other groups of business partners, complying with the approval requirements implemented to date or those that may be implemented over time; Employees may not contract with third parties that do not comply with the established requirements. For the approval of third parties, the procedures and guidelines established by the respective area must be followed.

3. RESPONSIBILITY OF EMPLOYEES IN BUSINESS WITH THIRD PARTIES (DUE DILIGENCE TO CUSTOMERS AND SUPPLIERS).

The Employees responsible for deciding whether to engage third parties are responsible for evaluating at the beginning of the commercial operation or other type of transaction that the third parties are not affected by a circumstance that prevents them from dealing with the Corporation from a compliance perspective. To this end, they must perform due diligence on the operation itself and on the third party, requesting and reviewing, among other things: commercial references, the personal and criminal background of its shareholders and officers, the credit history, and the reputation and image of the third party before establishing a business relationship between the third party and the Corporation.

It is in the interest of the Corporation to have business relationships with third parties that share the same values and ethical principles, so it is the responsibility of all Employees to detect and report any behavior of third parties that violate and contravene the Corporate Compliance Policy, the Corporate Code of Ethics and other complementary rules, which derive or could derive in criminal acts related to corruption such as: bribery, collusion, influence peddling, corruption among private parties, money laundering, financing of terrorism. It must be kept in mind that any situation that could affect third parties could have a negative influence on the good image of the Corporation, and could even make us responsible for or complicit in a criminal act under the presumption that we knew of such a situation.

Thus, the different areas of the Corporation, depending on the activities they carry out with third parties, must observe the following measures in the framework of the prevention of corruption and related crimes:

a. In the case of client registration:

The commercial area of the Corporation must collect all the necessary information to register a company or natural person as a client in the CRM system. In addition to the administrative information required for both legal and commercial purposes, special attention must be paid to the reputation and good image of the company in the market.

This control responsibility lies primarily with the business management of the Corporation.

For more information, see the Corporate Standard for Due Diligence with Customers, Suppliers, and Employees.

b. When forming alliances and seeking partners to undertake a new business:

In any business in which the Corporation wishes to participate with third parties, the ethical and moral quality of these allies or partners in the development of their commercial activities and the reputation they enjoy in the market and of their shareholders and principal officers must be evaluated beforehand.

This requires going through a verification process (“due diligence”) of the third party with whom we are doing business.

As part of the documentation supporting this verification, where appropriate, affidavits will be signed for FIU and UCMI controls (only if the business partner is subject to report to the FIU), the protocol to be followed in the case of operations with companies included in the investigations of the Construction Club and others will be reviewed, as well as the documents to be completed by the responsible area, after the due diligence of a business partner, in order to record the compliance measures applied.

This control responsibility corresponds mainly to the Corporate Management of Strategy and Business Development, the Corporate Management of Corporate Affairs, the Finance Management, the General Management of Ferreycorp and the Corporate Ethics and Compliance Officer, as well as to all the general management of the Corporation, which are the actors that usually participate in this type of transactions.

For more information review GE-GACG-PRC-008 Corporate Procedure for the Control of Transactions, activities, operations and non-financial controls.

c. In the total or partial acquisition of shares of existing companies or their assets:

In all acquisitions of companies and assets owned by third parties, special consideration must be given to the legal origin of the assets to be acquired, the encumbrances and encumbrances affecting them, the image of the company or individual selling the assets, and its shareholders and principal officers. In the case of the acquisition of a company or its assets, a greater analysis is required, including within the due diligence process of the valuation and purchase process, the review of its compliance background, in order to detect any criminal act related to corruption issues, such as: bribery, collusion, influence peddling, corruption between private parties, money laundering, financing of terrorism, among other crimes, in which the company to be acquired, its directors and representatives may be involved. It is especially important to know this background, since when the Corporation acquires these businesses from third parties, it inherits all the liabilities and contingencies known to date or that may appear in the future, remaining hidden under a simple analysis.

As in the case of the previous paragraph, this control responsibility corresponds mainly to the Corporate Management of Strategy and Business Development of Ferreycorp, the Corporate Management of Corporate Affairs, the Finance Management, the General Management of Ferreycorp, the Corporate Ethics and Compliance Officer, as well as all the general managements of the Corporation, which are the actors that usually participate in this type of transactions.

For more information review GE-GACG-PRC-008 Corporate Procedure for the Control of Transactions, Activities, Operations and Non - Financial Controls.

d. In the purchase - sale of goods and / or the provision of services in general (customers / suppliers):

In the relationship with customers / suppliers, whether for the purchase - sale

of goods and services, it is required to go through a verification process (“due diligence”) of the customer / supplier with whom we are contracting.

The Employees in the logistics areas, in charge of purchasing or acquiring goods (vehicles, tools, computer equipment, cleaning materials, stationery and supplies, among others) and providing services (lawyers, notaries, advisors, consultants and specialists, accountants, auditors, carriers, customs agents, etc.), The company is responsible for gathering all relevant information on the identity, prestige and image of its suppliers in the commercial environment in which they operate, at the time of initiating a business relationship.

In the provision of services to third parties that carry out assignments, procedures, and represent the Corporation before public officials and government agencies, such as lawyers, notaries, advisors, consultants, accountants, auditors, customs agents, carriers, processors, and managers who represent us before judges, prosecutors, police, municipalities, the Ministry of Labor, Sunafil, Sunat, Indeci, Indecopi, and others, it is especially important to evaluate the ethical and moral quality of these suppliers and their reputation in the marketplace. We must bear in mind that any situation that may affect these service providers may negatively affect the good image of the Corporation, and may even make us responsible for or complicit in a criminal act under the presumption that we were aware of such a situation.

To this end, they must perform due diligence on the operation itself and on the third party, requesting and reviewing, among other things: commercial references, the personal and criminal background of their shareholders and officers, credit history, and the reputation and image of the third party, before establishing a business relationship between the third party and the Corporation.

This control of responsibility corresponds mainly to the Management of Administration and Finance, Corporate Management of Corporate Affairs, Management and Logistics Departments of the Corporation, and the managements that contract with such third parties.

The following are some of the warning signs that may arise in the above-mentioned cases and that will enable Employees to determine whether or not to initiate or maintain a business relationship with third parties, refraining from participating in transactions with parties that may be involved in corruption or related offenses. A business relationship should not be maintained with a third party that:

- d.1) Refuses to provide the requested information, presents inconsistent, unusual or dubious identifications.
- d.2) Has obtained a court decision, arbitration award or any other ruling or

process, or is under any complaint or journalistic investigation, which determines that it is being investigated or prosecuted for the crime of corruption or related or there are indications that lead to believe that the third party may be involved or compromised in illegal acts.

- d.3) Proposes the use of cash as a means of payment, in an attempt to avoid making transactions bankable.
- d.4) Proposes meetings with the personnel of the Corporation in a place other than its office or place of business.
- d.5) Manages businesses whose nature makes it impossible to verify the legality of its operations or the origin of the funds it mobilizes.
- d.6) Declares or registers the address of other persons with whom it has no apparent relationship.
- d.7) You have no credit record or commercial or banking history.
- d.8) You provide us with information that cannot be verified or give us false or inaccurate references.

As an important source of consultation for any concern related to a corruption issue related to a commercial operation with clients/suppliers, the Employees have access to the specialized areas of the Corporation for the prevention of: (i) money laundering and terrorist financing, where Ferreyros, Unimaq, Orvisa, Motriza, Motored and the Ferreycorp Association have control systems implemented under the supervision of the Financial Intelligence Unit (UIF), (ii) illegal mining with the pre-sale authorization of the Illegal Mining Control Unit (UCMI), implemented in Ferreyros, Unimaq, Orvisa, Motriza and Motored, (iii) drug trafficking, through the implementation of protocols and controls established in Fargoline, (iv) illegal logging in the timber industry in the activity developed by Orvisa and its subsidiaries in the jungle and (v) unauthorized fishing activity with the processes implemented for Ferreyros, Unimaq, Orvisa, Motored and Trex.

Employees are also responsible for permanently reviewing the updates of the lists of clients (companies and individuals) that may not do business with the

corporation because they have acknowledged that they have incurred in

corruption issues and must compensate the state or are under investigation, and that the Corporate Management of Corporate Affairs publishes according to information from the Ministry of Justice.

In addition, all Employees must be aware that the “Corporate Standard on the Delivery / Receipt of Gifts, Payments, Favors and Others” (GEN-GCAC-NC-001) is mandatory in order to know the limits to the conduct and behavior of public and private clients and suppliers with Employees and vice versa, and the “Corporate Standard on Conflict of Interest” (GEN-GCAC-NC-002) to inform the Corporation of any relationship of kinship or friendship of an Employee with a client or supplier, which should lead to an abstention or removal from the selection process.

Once the business relationship has begun, it is also the responsibility of the Employees in charge of managing this relationship to monitor at all times that the legal and reputational standards required by this standard are met, identifying any situation that was not disclosed by the business partner at the time of contracting or that is supervening to the relationship already initiated, which leads to reconsidering whether or not to continue in this relationship.

Finally, it should be noted that the Employees must ensure that the contracts that formalize the business relationship include clauses of submission to our Corporate Compliance Policy, Corporate Code of Ethics and the principles of the Global Compact, as well as the Anti - Corruption Clauses.

For more information, see the Corporate Standard for Due Diligence with Customers, Suppliers and Employees.

4. CONTROL OF OPERATIONS.

At the slightest doubt or suspicion that the operation to be carried out or that is in progress may be affected by any of the situations described in the preceding paragraph, the Employee responsible for it or any Employee who becomes aware of these circumstances, must raise an alert to analyze in greater detail this situation, which could lead to frustrate the performance of the business or the contracting of the service, and must bring the occurrence of this situation to the attention of: (i) their immediate boss, (ii) of the general managers of each company, or (iii) of the Corporate Ethics and Compliance Officer through the Whistleblower Channel, these being responsible for taking the corresponding actions according to the analysis performed, including avoiding the operation that had been under negotiation.

In the anti - corruption control of commercial operations, the use of the channels established by law and by corporate regulations at the time of making payments is

of transcendental importance.

Thus, when making payments to third parties or payments to be made by third parties on behalf of the Corporation, the corporate guidelines established for this purpose must be followed to provide greater security in the control of acts of corruption.

In the case of payments received by the Corporation, these must necessarily be channeled through the financial system, in the accounts and with the banks with which the Corporation works.

In the case of payments made by the Corporation, it must observe the use of bancarized means of payment and never make payments in cash, in the name of the entity that performed the service and not in the name of a different entity, in strict compliance with the authorization levels stipulated in the internal regulations, and an adequate and timely record by the official responsible for managing the cash or the resources of the Corporation.

It is strictly prohibited to receive payment from a third party or to make a payment to a third party in cash or using a mechanism outside the banking system.

If, during the execution of the business relationship, it is affected by any irregularity at the time a payment is made, the Employee in charge of the payment, or any Employee who becomes aware of this situation, must inform the Corporate Ethics and Compliance Officer, the Corporate Finance Manager, or the general managers of each company, as soon as possible. Once this situation is known, it must be evaluated at management level, under responsibility, whether or not the continuity of the relationship is appropriate according to the seriousness of the event that affects it.

Before any other business interest, the decision to terminate the business or the provision of the service shall take into consideration the protection of the reputation and goodwill of the Corporation.

THIS DOCUMENT HAS BEEN AUTHORIZED IN THE REGULATORY SYSTEM BY:

ROLE	NAME	POSITION	DATE
Elaborator	Eduardo Ramirez del Villar	CORPORATE MANAGER OF CORPORATE AFFAIRS.	Approved - 12/09/2022 18:48
Reviewer	Eduardo Ramirez del Villar	CORPORATE MANAGER OF CORPORATE AFFAIRS.	Approved - 12/09/2022 18:52
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