

ESG Brochure – Public

The information in this brochure complements what we shared in the 2024 Sustainability Report, with the purpose of providing further insight into sustainability management at Ferreycorp and its subsidiaries. This document is aligned with the requirements of the Corporate Sustainability Assessment (CSA) to create value for all our stakeholders.

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Governance Dimension

Good Corporate Governance

Governance ESG

Ferreycorp's Corporate Sustainability Committee serves as a fundamental strategic body for promoting and coordinating sustainability initiatives across the organization. This committee is a cornerstone of the company's commitment to creating shared value, or "Juntos creamos desarrollo" (Together we create development), as its mission states. It ensures that all sustainability efforts in environmental, social, and corporate governance (ESG) matters are aligned with corporate objectives and standards.

The committee's primary functions are to:

- Align initiatives with corporate strategies.
- Work in a coordinated manner to generate synergies that optimize resources and achieve a greater impact.
- Strengthen and keep knowledge updated on sustainability topics.
- Monitor sustainability indicators to measure the impact of initiatives and report results to stakeholders.

The committee is composed of representatives from each of the subsidiaries and key corporate leaders, including the heads of Human Resources, Finance, and the Environment. The image shows the corporate leaders responsible for the three ESG pillars:

- Environmental: Carolina Navarro and Natalí Espinosa.
- Social: Maria Teresa Merino, Mariella Ferrero and Anel Mancisidor.
- Governance: Jimena Davelouis, María del Carmen Blume, and Elizabeth Guardamino.

This structure ensures that sustainability is not just a policy but a deeply integrated part of the company's operational and strategic framework, with clear responsibilities assigned at a high level.

The committee holds at least four meetings a year to evaluate the materiality of initiatives before they are elevated for final approval. They reviewed progress, discussed new strategies, and planned for future initiatives. The meetings involved representatives from all main subsidiaries, including Ferreyros, Unimaq, Orvisa, and Fargoline, among others, reflecting a company-wide commitment to sustainability.

By fostering a collaborative environment and defining clear objectives, the Corporate Sustainability Committee drives Ferreycorp's long-term vision of operating responsibly and creating lasting value for its employees, clients, and the community.

Comité de Sostenibilidad



ALCANCE



OBJETIVO DEL COMITÉ DE SOSTENIBILIDAD



Alinear las iniciativas de sostenibilidad con el propósito de la empresa "Juntos creamos desarrollo", los objetivos estratégicos y normas corporativas.



Trabajar de manera coordinada, generando **sinergias para optimizar** los recursos y lograr un mayor impacto.



Fortalecer y mantener actualizados nuestros **conocimientos sobre Sostenibilidad**



Monitorear indicadores de sostenibilidad para medir el impacto de nuestras iniciativas y reportar sus resultados a nuestros grupos de interés.

RESPONSABLES CORPORATIVOS



Carolina Navarro
Sub. Gerente de Ser. Corp. y Medio Ambiente

Natali Espinoza
Especialista de Medio Ambiente y Sost.



Patricia Gastelumendi
Gerente Corporativo de Finanzas

Maria Teresa Merino
Gerente Corporativo de Recursos Humanos

Mariella Ferrero
Sub. Gerente de Responsabilidad Social y Directora de la Asociación Ferreycorp

Anel Mancisidor
Asistente de Responsabilidad Social



Jimena Devinathea
Gerente de Tesorería Corp. y Relación con Inversionistas

María del Carmen Blume
Sub Gerente de Cumplimiento

Elizabeth Guardamino
Ejecutivo Senior de Riesgos Corporativos

Rafael Solari
Ejecutivo de Relaciones con Inversionistas



Emisiones y energía

Emisiones en tCO₂e (alcance 1 y alcance 2)

Porcentaje de reducción de emisiones respecto al año base 2017 en los nueve locales de mayor envergadura

Meta de reducción de emisiones al 2030, respecto al año base 2017 en los nueve locales de mayor envergadura

Consumo total de energía eléctrica en GI

Agua

Consumo de agua en m³ a nivel corporativo

Residuos

Porcentaje Residuos generados fueron reciclados en 2021



Colaboradores

Número total de colaboradores

- Balance trabajo/familia, flexibilidad de horarios, trabajo híbrido
- Equidad de género e inclusión laboral
- Beneficios laborales
- Gestión de Desempeño
- Capacitaciones
- Programa de Sucesión y desarrollo de líderes

Comunidad

Asociación Ferreycorp

- Beneficiarios (histórico)
- Participantes talleres
- Conexiones en vivo a eventos virtuales

Club de Operadores y Club de Técnicos

- Miembros de ambos clubes
- Conexiones en vivo a charlas virtuales del Club de Operadores

Obras por impuestos

- Número de OXIs
- Inversión de OXI en millones de soles
- Beneficiarios OXI



Gobierno Corporativo

Número de accionistas

Dividendos pagados en millones de soles

Dividend yield

Número de accionistas que participaron en la junta de marzo

Quorum - Junta de marzo

Número total de directores

Número de directores independientes

Número de directores mujeres

Riesgos y cumplimiento

N° de Empresas Certificadas ISO 37001

N° de Empresas Certificadas Antisoborno

Cadena de Suministro

N° de proveedores a nivel corporativo

N° de proveedores homologados

N° de proveedores capacitados

Horas hombre de capacitación a proveedores

FUNCIONES DEL COMITÉ DE SOSTENIBILIDAD

- El Comité de Sostenibilidad de Ferreycorp y sus subsidiarias, es un espacio fundamental para impulsar y coordinar nuestras iniciativas en materia ambiental, social y de gobierno corporativo.
- Con el firme compromiso de generar valor sostenible a largo plazo, este comité articula los esfuerzos de todas nuestras empresas para integrar la sostenibilidad como parte de nuestra estrategia de negocio.
- A través de la colaboración y la innovación, buscamos fortalecer nuestro impacto positivo en el entorno y en las comunidades donde operamos, reafirmando nuestro rol como líderes responsables en el sector.
- Dentro de este comité se cuenta con la participación de un representante por cada una de las subsidiarias de la corporación.
- Anualmente, se tiene previsto realizar al menos cuatro sesiones del comité.
- El Comité tiene la responsabilidad de validar la Materialidad de la corporación, un paso previo a su elevación para la aprobación formal por parte de la miembro del directorio, Mariela García.
- El Comité se encarga de impulsar la elaboración del Reporte de Sostenibilidad.

Primer Comité de Sostenibilidad del año 2025

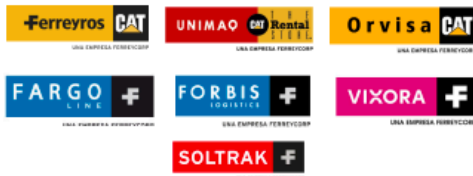
En la sesión del Comité de Sostenibilidad, llevada a cabo la primera semana del año, se abordaron, durante tres horas, los objetivos estratégicos que se buscan alcanzar para el año 2025. La reunión contó con la activa participación de representantes clave de las áreas corporativas de Social, Medio Ambiente y Gobernanza (ESG), así como los representantes de nuestras principales subsidiarias en Perú: Ferreyros, Orvisa, Unimaq, Forbis Logistics, Fargoline, Soltrak, Trex, Vixora y Ferrenergy.

La sesión se desarrolló desde las 9:00 a.m. hasta pasado el mediodía, siendo inaugurada por la Gerente de Finanzas Corporativa, Patricia Gastelumendi, quien ofreció unas palabras de bienvenida que marcaron el inicio de un productivo intercambio de ideas y la discusión de los temas de la agenda."



Segundo Comité de Sostenibilidad

En el mes de abril se desarrolló exitosamente la segunda sesión del Comité de Sostenibilidad (11:00 a.m. - 2:00 p.m.), con la valiosa presencia de los representantes de nuestras subsidiarias. Durante la reunión, se analizaron los avances y la aplicación de nuestras estrategias de sostenibilidad. Un punto central fue la definición de los detalles del concurso de voluntariado "Desafío Solidario" (marzo-junio), incluyendo la designación de los jurados calificadores por etapa y la planificación de los próximos pasos. Asimismo, se discutieron temas relevantes sobre el Reporte de Sostenibilidad y demás iniciativas que se realizarán en el primer semestre del año.



Supply Chain

ESG Program

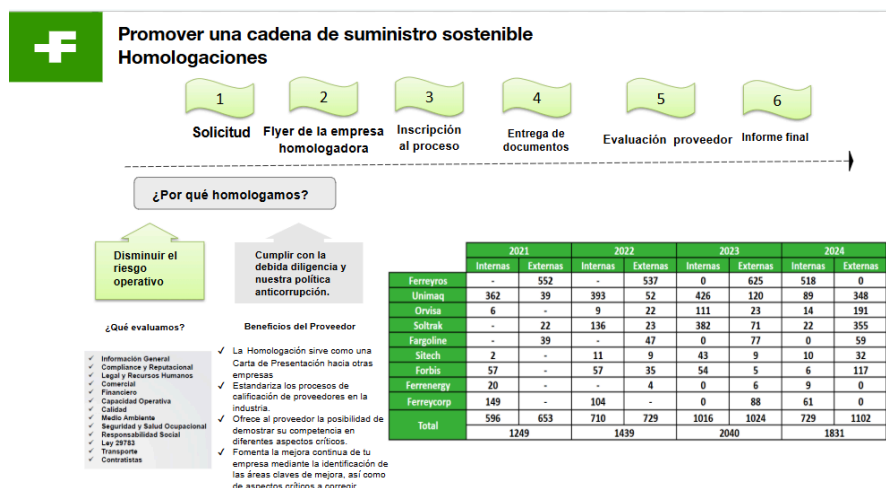
The ESG program for Ferreycorp's suppliers and its subsidiaries seeks to promote the adoption of sustainable practices among them, with the objective of improving environmental, social, and governance performance. This program is aligned with one of the fundamental pillars of Ferreycorp's business strategy: Sustainability.

Supplier Selection

Ferreycorp and its subsidiaries carry out corporate bidding processes to acquire goods or contract services. In these private processes, selection criteria such as price, quality, delivery time, and sustainability best practices (environmental, social responsibility, and governance) are considered, assigning different weights to each variable. In addition, the contracts signed with any supplier include anti-corruption clauses, ethical principles, and sustainable development commitments.

Supplier Evaluation and Development

Supplier evaluation within the corporation is carried out through the Homologation process, covering the period from 2021 to 2024:



Ethics and Integrity

Inquiry and Whistleblowing Channels

It is important to note that Ferreycorp has a Corporate Ethics and Compliance Officer, a whistleblowing channel, and training processes for employees and suppliers on these matters. Each of these elements is essential for the proper functioning of the system.

According to the provisions of the Code of Ethics, the Ethics Officer is responsible for overseeing the correct application of said code and is the person to whom directors, employees, or any third party in general must promptly report any event, situation, or inappropriate conduct contrary to the provisions of this standard, using the established reporting channels.

These are the reporting channels of the Compliance System, which are publicly accessible to all stakeholders of the corporation and its subsidiaries

- Website:
<https://admincms.ferreycorp.com.pe/adjunto/upload/landings/formulario-etica/>
- Email: 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.



FORMULARIO DE DENUNCIA

Mediante este formulario se debe reportar y/o denunciar cualquier actuación, conducta, información, evidencia o sospecha que contravenga las normas del Código de Ética de la Corporación, la Política Corporativa de Cumplimiento, así como las normas internas y externas de aplicación para la empresa. Este canal no debe ser utilizado para asuntos laborales que deben ser tratados a través de los jefes directos o de la gerencia del Área de Recursos Humanos (como son asuntos referidos a condiciones de trabajo o a prestaciones laborales) o para informar hechos que pueden ser considerados rumores donde no hay pruebas o hechos que los confirmen.

Agradecemos y valoramos que ponga en nuestro conocimiento estos hechos y colabore con la investigación. La mayor cantidad de información que nos brinde servirá para realizar un mejor análisis de la situación encontrada y llevar a cabo las acciones necesarias para detener estos hechos y evitar que se repitan en el futuro.

La información brindada a través de este formulario será recibida por el Oficial de Ética y Cumplimiento Corporativo, quien cuenta con mecanismos y procesos internos seguros que garantizan la confidencialidad de la misma, así como el respeto del anonimato del denunciante si la denuncia se formula de esta manera. La Corporación garantiza que las personas que colaboren de buena fe estarán libres de cualquier tipo de amenaza, coacción o represalia.

1

2


3

Corporate Policy on Gifts, Payments, Favors, and Other Benefits

Ferreycorp has a Corporate Policy on Giving and/or Receiving Gifts, Payments, Favors, and Other Benefits, which establishes clear guidelines and restrictions applicable to all subsidiaries and operations of the corporation. This policy:

- Prohibits the acceptance of gifts or benefits that could create conflicts of interest.
- Defines thresholds and specific exceptions in cultural or institutional contexts, always requiring prior and documented approval.
- Reinforces transparency in business relationships and prevents any form of undue influence on decision-making.
- Complements the principles of the Code of Ethics and the Corporate Compliance System, consolidating a culture of integrity and zero tolerance towards corruption.

Through this policy, Ferreycorp ensures that all employees and stakeholders adhere to the highest ethical and professional standards.

	CORPORATE POLICY ABOUT GIVING AND/OR RECEIVING GIFTS, PAYMENTS, FAVORS AND OTHERS	CÓDIGO	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 Fabón	GENERAL MANAGER	Approved - 12/09/2022 22:06

Corporate Donations Policy

Ferreycorp's Donations Policy constitutes a governance framework designed to ensure transparency, traceability, and the strategic alignment of the corporation's and its subsidiaries' social contributions. By defining criteria for beneficiary selection, priority impact areas, and authorization levels, the policy guarantees that resources are directed toward initiatives that promote sustainable development, such as education, health, responsible citizenship, emergency relief, and corporate volunteering. This systematic approach reinforces the company's capacity to generate shared value while mitigating risks associated with discretionary or misaligned practices in relation to ESG principles.

Moreover, the policy incorporates strict control and prohibition mechanisms that strengthen its integrity, including the exclusion of beneficiaries with corruption records, the prohibition of political contributions, and the mandatory registration, auditing, and formalization of all donations through contracts and certifications. The articulation with the Social Responsibility and Corporate Audit departments provides institutional legitimacy and oversight, ensuring that every donation complies with ethical, legal, and international governance standards. In doing so, Ferreycorp consolidates corporate donations as a strategic tool for sustainability and responsible governance, while reinforcing its commitment to accountability and long-term value creation.

	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

Annex 1: Corporate Compliance Manual

The Corporate Compliance Manual serves as a foundational document for Ferreycorp's comprehensive Compliance System (CS). The manual's primary objective is to detail the system's function and ensure that the entire corporation, including its subsidiaries and all employees, adheres to a strict code of ethics and legal requirements. The manual's scope is broad, extending to all corporate entities and business partners, reflecting a commitment to ethical conduct at every level of its operations.

The manual is built upon a core principle of zero-tolerance for a range of offenses, including bribery, money laundering, and various forms of corruption. This approach is aligned with international standards like ISO 37001:2016 and national legislation, such as Law No. 30424, demonstrating Ferreycorp's dedication to maintaining a reputable and lawful business. The system is led by both the Governing Body and Senior Management, with a dedicated Corporate Ethics and Compliance Officer overseeing its implementation and effectiveness.

Key to the manual's operational framework are systematic processes such as risk assessment, due diligence, and robust financial and non-financial controls. It also provides clear procedures for reporting misconduct through a confidential "Whistleblowing Channel," ensuring that employees can raise concerns without fear of retaliation. The system's performance is continuously evaluated through internal audits and management reviews,

ensuring its ongoing relevance and effectiveness in promoting a culture of integrity and ethical conduct.

Corporate Compliance Policy

Ferreycorp's Corporate Compliance Policy establishes a comprehensive governance framework that safeguards the corporation and its subsidiaries against corruption and financial crimes, including bribery, collusion, influence peddling, money laundering, and terrorist financing. The policy is aligned with international standards such as ISO 37001:2016 and national legislation, and it defines clear objectives to prevent, mitigate, and manage risks of misconduct. It emphasizes the responsibility of all employees, managers, shareholders, and suppliers to uphold the highest ethical standards, while fostering a culture of integrity and transparency across all business operations.

Furthermore, the policy formalizes mechanisms for monitoring, reporting, and responding to potential violations, ensuring confidentiality and protection for whistleblowers. The appointment of an independent Corporate Ethics and Compliance Officer, with direct authority and resources, guarantees impartial oversight and the continuous improvement of the Compliance System. Through this structured approach, Ferreycorp reinforces its accountability, enhances trust with stakeholders, and consolidates its commitment to ethical conduct as a driver of sustainable and long-term corporate value.

	CORPORATE COMPLIANCE POLICY	CODE	VERSION
		GEN-GCAC-PC-002	02
		START DATE OF VALIDITY	END DATE OF VALIDITY
		26/06/2019	31/12/2026
MANAGEMENT IN CHARGE	CORPORATE MANAGEMENT OF CORPORATE AFFAIRS		
PREPARED BY	CHECKED BY	APPROVED BY	
Eduardo Ramirez del Villar	Eduardo Ramirez del Villar	Mariela Garcia de Fabbri	
CORPORATE MANAGER OF CORPORATE AFFAIRS	CORPORATE MANAGER OF CORPORATE AFFAIRS	GENERAL MANAGER	

1. OBJECTIVE:

The purpose of this corporate policy is to inform that Ferreycorp S.A.A. and its subsidiaries (hereinafter referred to as the "Corporation") are committed to the highest ethical standards and legal compliance in the development of their business activities.

2. SCOPE:

This policy is applicable to all subsidiaries, their divisions, headquarters and areas, and to the processes, business decisions and actions of employees throughout the Corporation. In this regard, this policy takes into consideration the Corporation's commitment to fight against the commission of the crimes of bribery, collusion, influence peddling, money laundering and terrorist financing (hereinafter referred to as the "Crimes").

- Transnational active bribery (Art. 397-A of the Peruvian Criminal Code)
- Generic active bribery (Art. 397 of the Peruvian Criminal Code)
- Specific active bribery (Art. 398 of the Peruvian Criminal Code)
- Collusion (Art. 383 of the Peruvian Criminal Code)
- Influence peddling (Art. 499 of the Peruvian Criminal Code)

- Money Laundering (Art. 1, 2, 3, 4 of Legislative Decree № 1106 on the effective fight against money laundering and other crimes related to illegal mining and organized crime).
- Terrorist Financing (Art. 4-A of Decree-Law № 25475 on the penalty for the crime of terrorism and the processes of investigation, pre-trial and trial proceedings).
- Corruption in private spheres (Art. 241-A of the Peruvian Criminal Code).
- Corruption in private entities (Art. 241-B of the Peruvian Criminal Code).

3. DEFINITIONS

- Collusion: The crime is committed when a person agrees with a public official to favor the selection of a bidding process.
- Transnational active bribery: The crime is committed when a person makes a payment (bribe) to a public official of another country in order to be illegally favored by that official.
- Generic active bribery: The crime is committed when a person, in any form or by any means, offers, gives, or promises to give a public official an asset (tangible or intangible), advantage, or benefit so that s/he performs or omits acts in violation of his/her obligations.
- Specific active bribery: The definition is similar to that of generic active bribery; however, in this case the public official could be a judge, prosecutor, expert, arbitrator, member of the administrative or analogous tribunal, secretary, rapporteur, specialist, jurisdictional assistant, witness, translator and law firm.
- Influence peddling: The crime is committed when a person, invoking or having real or simulated influences, receives, causes

others to give or promise to himself/herself or to a third party, an undue advantage or benefit by offering to intercede before a public official who shall know, know or has known a judicial or administrative process.

- **Money laundering:** The crime involves disguising or concealing the illicit origin of money, property or profits derived from predicate offences, usually by means of several activities carried out by one or more individuals or legal entities.
- **Terrorist financing:** The crime involves providing, contributing or collecting funds, financial or economic resources to support any terrorist act, or a terrorist group.
- **Private Corruption:** The crime is committed when a partner, shareholder, attorney, whether or not legally appointed, directly or indirectly accepts, receives or requests a donation, promise or any other undue advantage or benefit of any nature for himself/herself or for a third party, for the purpose of carrying out or omitting one of his/her responsibilities, favoring another person in the acquisition or commercialization of goods or merchandise, in the contracting of services or in commercial relations.
- **Corruption in private entities:** This crime is committed when a partner, shareholder, attorney, whether or not legally appointed, directly or indirectly accepts, receives or requests a donation, promise or any other undue advantage or benefit of any nature for himself/herself or for a third party, for the purpose of carrying out or omitting one of his/her responsibilities to the detriment of the legal entity. The party giving the undue advantage is the one committing the crime.
- **Corporate Ethics and Compliance Officer:** Responsible for the compliance of the corporation's Compliance System.

4. COMMITMENTS AND OBJECTIVES:

- The Corporation is committed to fighting Crimes by establishing principles that guide the behavior of all its employees, shareholders, partners, independent professionals in the rendering of legal services, and suppliers of goods and/or services in general, related to the Corporation.
- The Corporation strictly prohibits bribery in any of its forms, whether directly or indirectly through an agent or a third party, whether in relation to a public official or an individual or legal entity, as well as participating in any situation that may result in collusion, influence peddling, money laundering and terrorist financing.
- For the development of this policy, as well as of the measures and design of the Compliance System derived from it, the Corporation's performance as well as the requirements established by ISO 37001:2016, the current laws and regulations on compliance and prevention of crimes applied to the Corporation in the development of its activities have been taken into consideration by using the necessary resources for its adequate application and effectiveness, which is subject to revisions and permanent monitoring in order to apply the necessary improvement measures at all times and adapt to possible changes of context for achievement of the following main objectives:
 1. To eliminate, mitigate, transfer and/or manage any exposure to risks of bribery, collusion, influence peddling, money laundering and terrorist financing in its activities.
 2. To prevent actions or behaviors that violate current legislation established in Law № 30424, Law № 30835, and Legislative Decree № 1352 and Legislative Decree № 1385 and Supreme Decree 002-2019-JUS, and other rules applicable over time, or those perceived by stakeholders as ethically unacceptable.

3. To train and sensitize employees, chiefs, managers, shareholders, directors and suppliers on the criminal risks to which their activities are exposed, as well as on the adequate response mechanisms established by the Corporation.

Through which we identify and periodically evaluate the risks of Crimes to which the activities of the Corporation are exposed, documenting the results in the crime risk identification and assessment matrix, and then establish risk control plans for those risks evaluated above "low risk", in order to prevent and reduce their probability of occurrence, as well as to establish monitoring and control mechanisms.

- The Corporation has implemented secure internal mechanisms and processes to ensure the confidentiality of formal complaints and other communications regarding breaches of ethical standards that may be received, as well as to protect from any type of threat or coercion people who collaborate with this objective through communication and reporting.
- The Corporation has a Corporate Code of Ethics in force and approved by the Board of Directors of Ferreycorp S.A.A., which is mandatory for all its employees, who are informed of its enforceability from the moment they join the Corporation, and to all interest groups related to the Corporation. Said Code of Ethics applies to all employees of the Corporation without prejudice to the legal consequences that may fall upon them for those acts, facts or conducts that involve a violation of the law.

5. RESPONSIBILITIES:

Any member of the Corporation, whether an employee, manager, shareholder, representative, supplier and/or person acting in an authorized manner in the name or on behalf of the Corporation, has the

duty to communicate and/or report any action, conduct, information or evidence that is susceptible or suspected of violating the Corporation's Compliance Policy and that may involve a criminal act or conduct. To this effect, the following means have been made available so that any person may report any kind of suspicious fact or conduct, or may raise any doubt or query about it:

- By personal interview with the Corporate Ethics and Compliance Officer.
- By sending an email to: canalddenuncias@ferreycorp.com.pe
- By calling 626-4110.
- By making a formal complaint online at https://www.ferreycorp.com.pe/canal_denuncias/
- By putting a formal complaint in a mailbox

The Corporation appreciates and values the reporting of any indication or suspicion of violation of legality by any employee, person or organization related to the Corporation. For this reason, the Corporation appreciates as much detail as possible in reporting/informing the facts.

To provide assurance of independence, the Board of Directors of the Corporation has appointed a Corporate Ethics and Compliance Officer, a position endowed with adequate capacity, independence and authority to ensure the correct implementation, monitoring and improvement of the Compliance System, according to the defined and agreed requirements.

The appointed Corporate Ethics and Compliance Officer is available to all employees of the Corporation to advise, guide and support them in matters of ethical performance and compliance. Likewise, the Corporation shall have all the necessary resources to carry out the actions, measures and controls planned in the Crime Risk Control Plan.

THIS DOCUMENT HAS BEEN AUTHORIZED IN THE REGULATORY SYSTEM BY:


ROLE	NAME	POSITION	DATE
Preparing	Eduardo Ramirez del Villar	CORPORATE MANAGER OF CORPORATE AFFAIRS	Approved -
Checking	Eduardo Ramirez del Villar	CORPORATE MANAGER OF CORPORATE AFFAIRS	Approved -
Approving	Mariela Garcia de Fabbri	GENERAL MANAGER	Approved -

Corporate Compliance System Policy (SP)

Ferreycorp's Corporate Standard on the Management of Compliance Obligations establishes a systematic framework for the identification, maintenance, control, and updating of all regulatory and voluntary commitments applicable to the Compliance

System. By incorporating legal requirements, ISO standards, industry best practices, and voluntary agreements, the standard ensures that the corporation and its subsidiaries operate under the highest levels of legal certainty and ethical commitment. The policy assigns responsibility to the Corporate Ethics and Compliance Officer for recording and updating the "List of Compliance Obligations," guaranteeing institutional accountability and continuous communication of applicable requirements to employees.

In addition, the standard includes structured procedures for monitoring regulatory changes, evaluating compliance on an annual basis, and taking corrective actions in the event of non-compliance. Through mechanisms such as external legal advice, participation in industry forums, and regular audits, Ferreycorp maintains its compliance system aligned with ISO 37001:2016 and Peruvian legislation on corporate liability. This proactive and preventive approach strengthens risk management, enhances organizational resilience, and reinforces the corporation's commitment to integrity, transparency, and sustainable business practices.

	CORPORATE COMPLIANCE SYSTEM POLICY (SP)	CODE	VERSION
		GEN-GCAC-NC-007	03
		INITIAL EFFECTIVE DATE	FINAL EFFECTIVE DATE
		10.01.2019	12.31.2027
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:

The purpose of this corporate standard is to manage the identification, maintenance, control and updating of the legal compliance obligations applicable to the Corporation's Compliance System (CS) (this concept being understood to include Ferreycorp S.A.A. and its subsidiaries).

2. REFERENCE OR CONCORDANCE:

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

3. SCOPE:

This corporate standard is applicable to all subsidiaries, their divisions, headquarters and areas, to processes, business decisions and actions of employees throughout the corporation.

4. CONTENT OF THE STANDARD:

4.1. General

The corporation systematically identifies its compliance obligations applicable to its Compliance System, as well as their implications for its activities, products and services.

Compliance obligations are the rules and requirements that the entire Corporation must comply with in relation to the Compliance System, either because of a regulatory obligation or because the Corporation itself has established them, even on a voluntary basis.

The following should be considered when addressing compliance obligations:

- Compliance Requirements: legal norms, ISO standards, international best practices, guidelines, industry codes and judgments on the subject.
- Compliance Commitments: agreements, organizational requirements, voluntary principles, codes of ethics, obligations arising from contractual agreements, norms and standards to which the Corporation subscribes.

4.2. Identification of Compliance Obligations

The **Corporate Ethics and Compliance Officer** is responsible for identifying and keeping on file the documents containing the compliance obligations of the Corporation's subsidiaries.

The following resources are available for the proper identification of compliance obligations:

- Official Journal *El Peruano*
- Business associations, organizations and guilds.
- Communications from other external stakeholders.
- Internet (web page)

The **Corporate Ethics and Compliance Officer** records the compliance obligations of the Corporation's subsidiaries in the "List of Compliance Obligations" register.

Laws, standards and other documentary references are filed physically or electronically. Repealed legal provisions are identified as such.

Requirements derived from voluntary agreements with stakeholders, such as contract clauses, technical specifications, among others, are kept in the corresponding documentation.

The **Corporate Ethics and Compliance Officer** must keep personnel whose activities or services may affect compliance with the requirements informed of any applicable requirements, for which purpose he/she may use forms that include information on such requirements.

4.3. Updating Compliance Obligations

The **Corporate Ethics and Compliance Officer** has the following resources available to keep informed of changes in laws and other compliance obligation

- Registration in the Legal Standards Bulletin of the journal *"El Peruano"*, as well as in information bulletins of law firms, electronic platforms of standards and laws, among others.
- Attendance to industry forums and seminars, as well as forums and seminars related to the activity or part of the organization's activities.
- Review of regulators' web pages
- Meetings with trade associations
- Advice from external legal counsel.
- Review of regulatory pronouncements and court rulings, among others.
- Review of contracts with customers and suppliers.

4.4. Evaluation of compliance obligations

On an annual basis, or whenever a new applicable compliance obligation or modification is detected, the **Corporate Ethics and Compliance Officer** must update the "List of Compliance Obligations", checking compliance with the requirements.

Likewise, contracts must be reviewed in order to verify their compliance with current regulations.

All employees must be informed of the compliance obligations for the correct maintenance of the applicable law.

4.5. Opening of Non-Compliance and Corrective Actions

In the event of non-compliance with an obligation, the **Corporate Ethics and Compliance Officer** shall open a non-conformity and take, in coordination with the personnel involved, the necessary measures to remedy such non-compliance.

5. SUPPLEMENTARY PROVISIONS:

5.1. Establishment of Compliance System (CS) Procedures

The Corporation establishes procedures in accordance with the list of procedures of the CS, which allow compliance with the requirements of ISO 37001:2016, the national legislation applicable to the administrative responsibility of the legal entity, as well as other legislation applicable to the Corporation.

5.2. Action in the event of conflicts of interest

In those cases in which a position/responsible person has to make a decision in relation to the identification/evaluation of compliance obligations and this affects him/her directly and/or in those occasions in which such responsible persons are faced with a conflict of interest, the foreseen decisions shall be made by his/her hierarchical superior or the General Management of the corresponding subsidiary.

5.3. Monitoring and measurement

For the evaluation of the effectiveness and monitoring of the correct application of this process and of any possible incidents that may be found, the provisions of the Corporate Procedure for the Monitoring and Measurement of the CS are followed.

6. APPENDICES:

6.1 APPENDIX 1: List of Compliance Obligations

APPENDIX 1

LIST OF COMPLIANCE OBLIGATIONS						Version: 01
No.	DOCUMENT TITLE	DATE OF ISSUE	ISSUING ENTITY	TYPE OF OBLIGATION	SUPPORT METHOD	OBSERVATIONS

Types of Obligations

1. Legal standards
2. Treaties, agreements, protocols
3. Compliance commitment

THIS DOCUMENT HAS BEEN AUTHORIZED IN THE REGULATORY SYSTEM BY:

ROLE	NAME	POSITION	DATE
Developer	Eduardo Ramirez del Villar	CORPORATE MANAGER OF CORPORATE AFFAIRS	Approved - 12/09/202218:48
Reviewer	Eduardo Ramirez del Villar	CORPORATE MANAGER OF CORPORATE AFFAIRS	Approved - 12/09/202218:52
Approver	Marifela Garcia Figari De Fabbri	GENERAL MANAGER	Approved - 12/09/202222:09

Information Security

Information Security Management Programs

1.1 Deployment of Cybersecurity Course at Corporate Level

- A corporate-level cybersecurity course was launched to strengthen awareness and best practices among employees.

1.2 Weekly Security Tips

- 44 weekly security tips were sent throughout the year to employees, covering relevant topics to reinforce safe practices in digital environments.

1.3 Phishing Simulation

- A phishing simulation was conducted with the participation of employees.

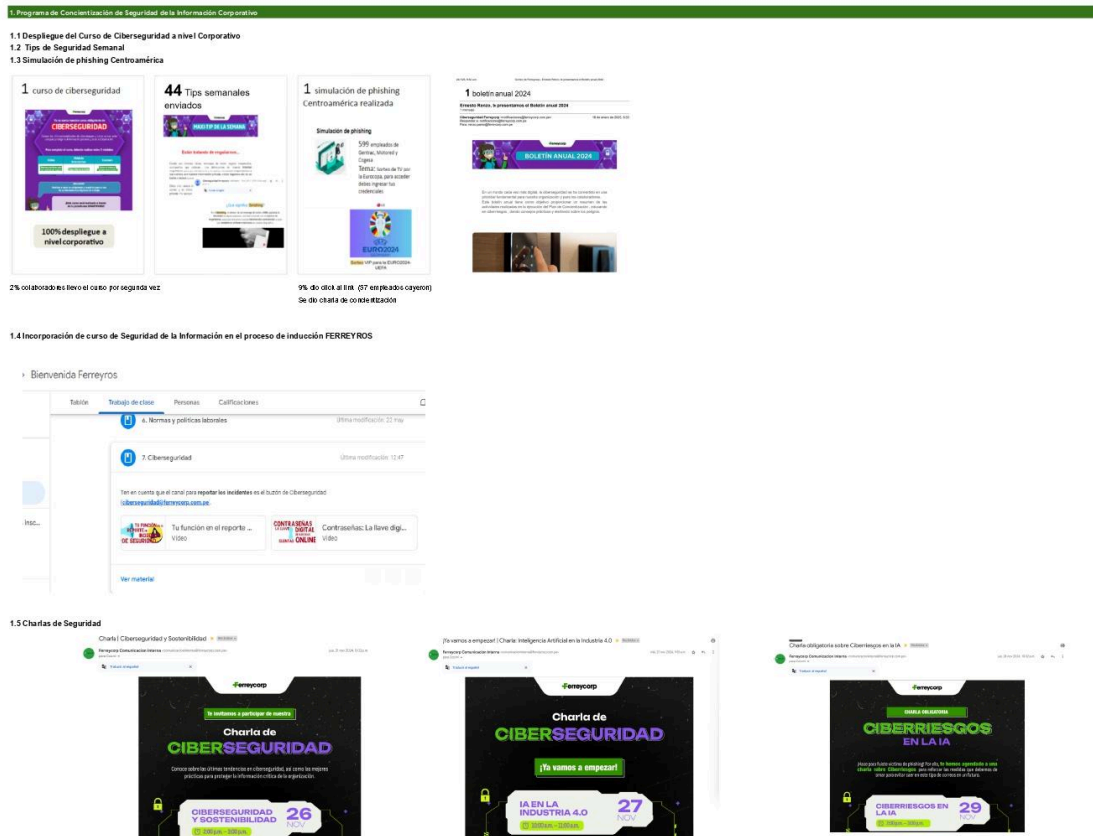
1.4 Integration of Information Security Course into Onboarding

- As part of Ferreyros' induction process, a specific Information Security module was included to ensure new employees are aware of security policies and reporting channels from day one.

1.5 Cybersecurity Talks

Several talks and awareness sessions were organized, including:

- "Cybersecurity and Sustainability" (November 26)
- "Artificial Intelligence and Cyber Risks in Industry 4.0" (November 27)
- "Cyber Risks in Artificial Intelligence" (November 29)



Social Dimension

Human Rights

Human Rights Training

At Ferreycorp and our subsidiaries, respect for and the promotion of Human Rights are fundamental pillars of our organizational culture. We implement a comprehensive continuous training program, delivered through monthly courses aimed at all our employees. Through initiatives such as the PARES Program, we address crucial topics including Diversity and Inclusion, Prevention of Sexual Harassment in the Workplace, Office and Workplace Safety, and Prevention of Disergonomic Risks, among others.

Our training process combines interactive virtual sessions and asynchronous modules through digital platforms such as Classroom, ensuring access for all employees across the corporation. To guarantee understanding and the internalization of these important topics, each training concludes with an evaluation that employees must complete. This way, we ensure that the knowledge acquired translates into respectful workplace practices and a safe, inclusive, and equitable working environment for all.

Courses delivered through Classroom:



29

Classroom > Hostigamiento Sexual Laboral 2024
Asociación Ferreycorp

Cursos en los que te has i...
Tareas pendientes
Lineamientos para la prev...
RIESGOS DISERGONOMIC...
SEGURIDAD EN OFICINAS ...
Sistema de Cumplimiento ...
Asociación Ferreycorp
Hostigamiento Sexual Lab...
Asociación Ferreycorp
Protección de Datos Perso...
Asociación Ferreycorp
PARES+ 2024
Asociación Ferreycorp
Clases archivadas
Ajustes

Tablón Trabajo de clase Personas



Próximas entregas
¡Yuju! ¡No tienes que entregar nada pronto!
[Ver todo](#)

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Capacitación Corporativa ha publicado nuevo material: Mira aquí los videos d...
3 jun 2024 (Última modificación: 3 jun 2024)

Tablón Trabajo de clase Personas



Próximas entregas
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[Ver todo](#)

Anuncia algo a tu clase

Seguridad y Salud ha publicado nuevo material: I. Introducción
31 oct 2024 (Última modificación: 31 oct 2024)

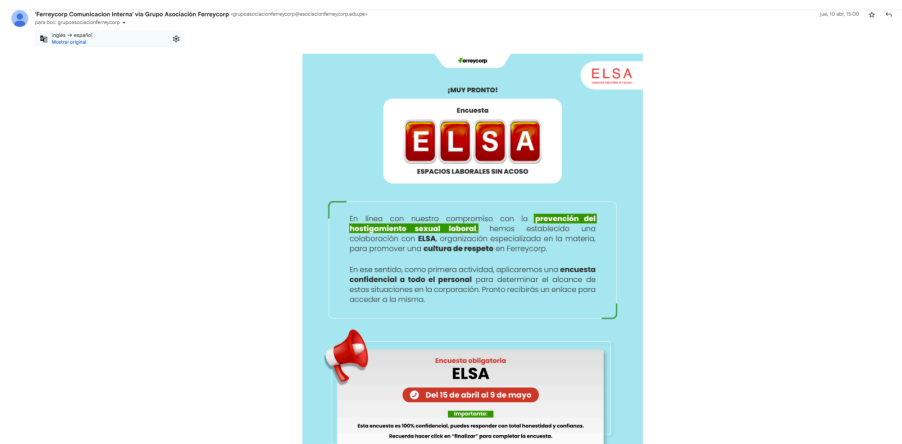
Harassment and Workplace Violence Protocol

At Ferreycorp and our subsidiaries, the prevention and eradication of sexual harassment in the workplace are a priority. For this reason, we have implemented mechanisms and programs designed to protect our employees and foster a safe and respectful work environment.

Through key initiatives like the ELSA (Free Space from Harassment Situations) and PARES (High Performance with Equity and Sustainability) programs, we provide our employees with the necessary tools and knowledge to:

- Identify and understand the behaviors that constitute sexual harassment.
- Know the safe and confidential channels for reporting any harassment situation.
- Understand the investigation and sanction procedures implemented by the corporation.
- Promote a culture of respect, equality, and zero tolerance for harassment.

Participation in training and evaluations on these topics is mandatory for all our employees. This ensures that every team member is properly informed about their rights, company policies, and available courses of action, thus reinforcing our commitment to a work environment where the dignity of each person is protected.



El Hostigamiento Sexual Laboral es una forma de violencia que se manifiesta a través de conductas no deseadas de naturaleza sexual o sexista, que puede crear un ambiente intimidatorio, hostil o humillante para la persona que las recibe, afectando su desempeño laboral, formativo o de cualquier otra índole.

¿Cuáles son las manifestaciones más comunes de Hostigamiento Sexual Laboral?

Estas conductas no siempre son explícitas. Incluso las bromas aparentemente inofensivas pueden ser una forma de hostigamiento.

¿Cómo podemos prevenirlo?

- Fomentar el respeto. Evita comentarios o acciones que puedan incomodar a otros.
- Hablar abiertamente. Educa y sensibiliza a tu entorno sobre lo que es hostigamiento sexual.
- Establecer límites. Comunica claramente cuando un comportamiento te resulta incómodo.
- Participar en capacitaciones. Aprovecha las oportunidades de aprendizaje que ofrece la empresa sobre este tema.

Si eres víctima o testigo:

1. **Reconoce la situación:** Identifica las conductas de hostigamiento y entiende que no estás solo/a.

2. **Apoya a otros:** Si eres testigo, no ignores la situación. Informa y respaldar a la persona afectada.

3. **Denuncia:** Usa los canales de la empresa para reportar casos de manera segura y confidencial.

Canales de denuncia:

- 824 - 400 / 981 970 638
- canaldedenuncias@ferreycorp.com.pe
- admincms.ferreycorp.com.pe/formulario-etica/

En el marco del Día de la lucha contra el Hostigamiento Sexual Laboral, te recordamos que si algún comentario, gesto o contacto te incomoda, tienes derecho a poner un alto. Nadie debería sentirse incómodo en su espacio de trabajo.

¡No minimicemos, no justifiquemos!

Si eres víctima o testigo, presenta tu denuncia a: RRHH de tu empresa

O en cualquiera de nuestros canales:

- 824 - 400 / 981 970 638
- canaldedenuncias@ferreycorp.com.pe
- admincms.ferreycorp.com.pe/formulario-etica/

¡Juntos creamos un ambiente seguro para todos!

Freedom of Association and Collective Bargaining

The only company in the Ferreycorp corporation that has a union and collective bargaining agreement is Ferreyros:

	Number	Percentage
Percentage of unionized employees with a collective bargaining agreement	734	14.4%

Human Capital Development

Employee Development Program

The Ferreycorp Experience represents an integral value proposition for employees that articulates benefits, opportunities, and experiences aimed at strengthening their well-being

and commitment within the work environment. Under the strategic pillars of "Smile," "Challenge Yourself," and "Transform," the organization promotes an organizational culture focused on personal growth, emotional balance, and professional development. This proposal is structured around four key dimensions of well-being: financial, physical, social, and emotional, holistically addressing employees' needs to create healthier, more motivating, and sustainable environments.

Experiencia Ferreycorp

La PVE es el conjunto único de beneficios, oportunidades y experiencias que en Ferreycorp ofrecemos a nuestros colaboradores para atraer, motivar y retener talento, generando mayor compromiso y mejorando el clima laboral.

Seguimos reafirmamos nuestro compromiso y promesa



SONRÍE

Promovemos el bienestar y equilibrio en la vida de nuestros colaboradores y sus familias a través de los programas que ofrecemos.



DESAFÍATE

Estamos comprometidos con el crecimiento profesional de nuestros colaboradores. Brindamos oportunidades de aprendizaje y capacitación constante, y alentamos el autoaprendizaje.



TRANSFORMA

Empoderamos como agentes de cambio, a través de proyectos que impacten como programas de infraestructura, responsabilidad social y de diversidad e inclusión, que crean oportunidades de desarrollo en beneficio de millones de personas.

Ejes de Bienestar Ferreycorp



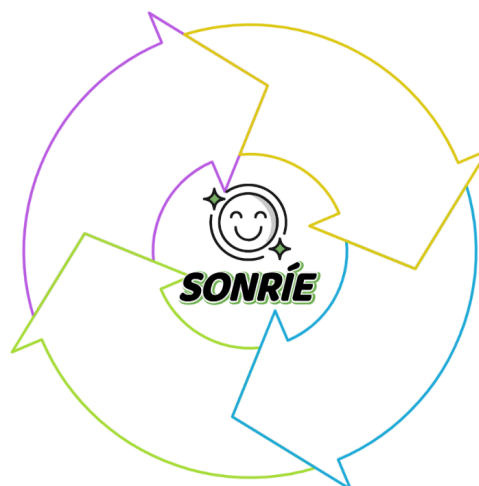
Bienestar Financiero

Gestión financiera personal y familiar.



Bienestar Social

Programa vivienda y equilibrio personal, laboral y familiar.



Bienestar Físico

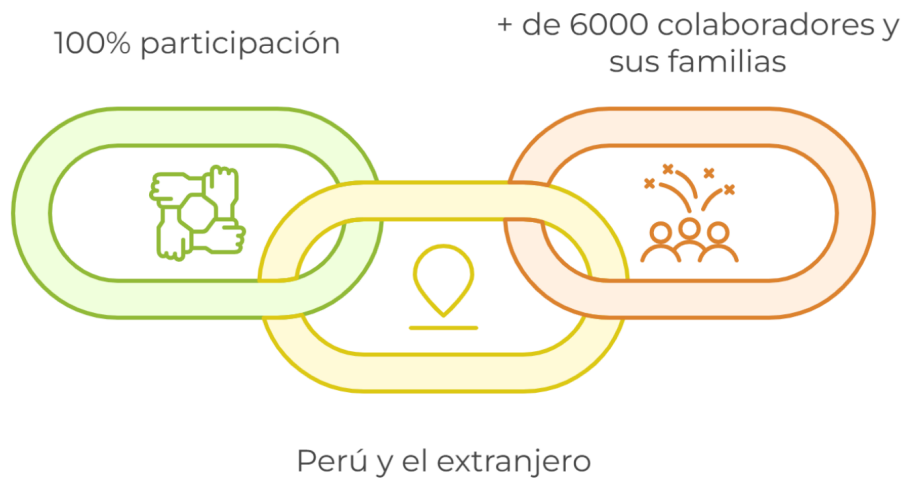
Alimentación, ejercicio, descanso (sueño) y salud físico.



Bienestar Emocional

Salud mental

¿Quiénes son los beneficiarios ?



a) Work flexibility:

The "Escalated Return" at Ferreycorp constitutes a flexible work arrangement designed to support new mothers in their professional reincorporation following maternity leave. This initiative is a strategic effort to facilitate a gradual transition back to full-time work while accommodating the critical needs of a new parent.

The policy's primary mechanism involves a progressive reduction of daily working hours. Specifically, new mothers have the option to work a reduced schedule upon their return and progressively increase their hours to a full 8-hour workday by the eighth month. A key financial component of this benefit is that employees receive their full, standard salary throughout this gradual return period, ensuring that their financial compensation remains unaffected by the temporary reduction in hours.

Furthermore, the program offers additional flexibility by allowing employees to combine their reduced hours with accrued vacation or lactation hours. This provision enables them to create more extended periods of rest, such as a full day off, thereby promoting a more balanced integration of work and personal life. The policy is accessible through direct coordination with the employee's immediate supervisor, streamlining the application process. Overall, this "Escalated Return" program demonstrates Ferreycorp's commitment to employee well-being and is a clear example of a progressive workplace flexibility policy aligned with modern corporate sustainability and social responsibility standards.

Retorno Escalonado: Ferreycorp

Aplica: A todas las madres colaboradoras, posterior a descanso pre y post natal

Autorización: Para acceder a este beneficio solo se requiere coordinación con el jefe directo.

En qué consiste:

Aquellas madres colaboradoras que, habiendo hecho uso de su licencia de maternidad, tienen la opción de laborar menos horas a su retorno y completar la jornada de manera progresiva luego del periodo post natal, percibiendo el íntegro de sueldo. La cantidad de horas laboradas en el día será según el cuadro adjunto.



b) EPS and Oncosalud Insurance

In the case of Ferreycorp, the company provides its employees with this type of comprehensive health coverage through a partnership with RIMAC EPS. This affiliation gives employees access to RIMAC's extensive network of clinics, which includes some of the most prominent medical facilities in Lima and across Peru. This ensures that employees have access to high-quality healthcare for general medical needs, emergencies, and specialized treatments.

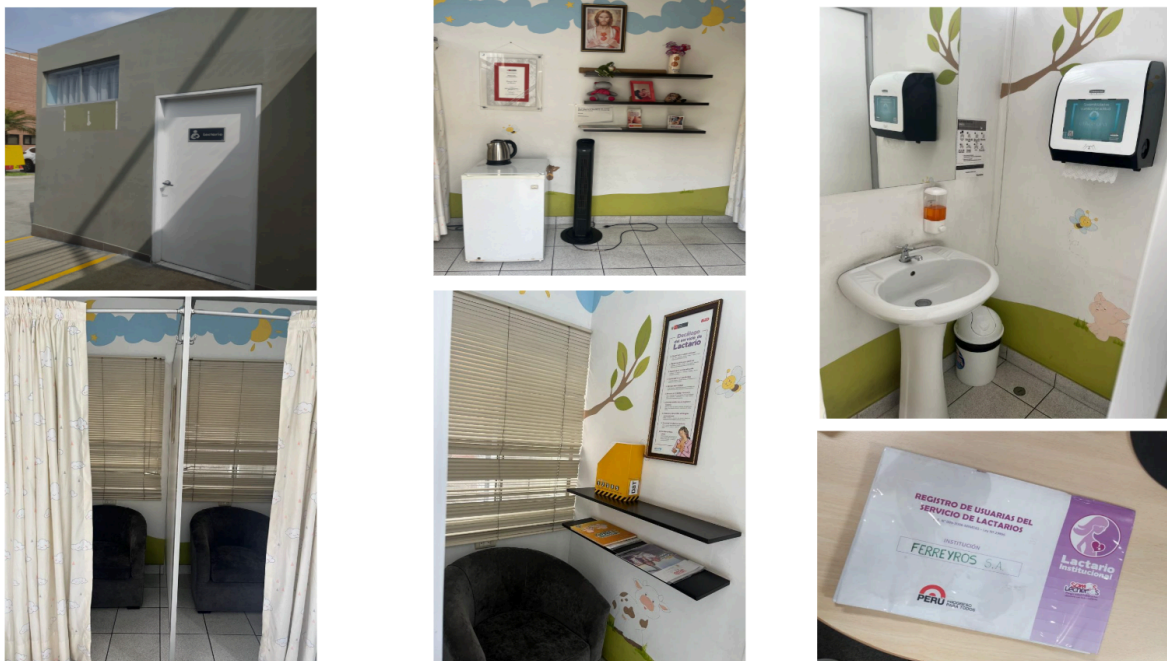
In addition to this general health coverage, Ferreycorp's benefits package includes a specialized insurance plan with Oncosalud. As the name suggests, Oncosalud focuses specifically on providing coverage for oncological diseases, including diagnosis, treatment, and ongoing care. This particular benefit underscores the company's commitment to employee well-being by providing a critical layer of financial and medical security against a serious illness. This dual-pronged approach, combining general EPS coverage with specialized oncological insurance, demonstrates a robust and caring corporate benefits strategy.



c) Lactation room:

In line with this commitment, Ferreycorp has established lactation rooms in its facilities, as shown at the Surco headquarters. These spaces are designed to be safe and comfortable environments where mothers can express breast milk. The images show a private area equipped with everything necessary, including a sink, to ensure hygiene and comfort. The existence of these rooms not only complies with legal regulations but also reinforces the company's culture of support for motherhood and the well-being of its employees.

Sede Surco - Staff Ferreycorp y Ferreyros



d) Wellness Initiatives

i) Emotional Well-being Pillar

Ferreycorp's Wellness Initiatives are programs designed to promote the health and well-being of its employees. The Emotional Well-being Pillar is a specific component of these initiatives that focuses on mental health. This pillar is divided into four main programs, which are detailed in the image:

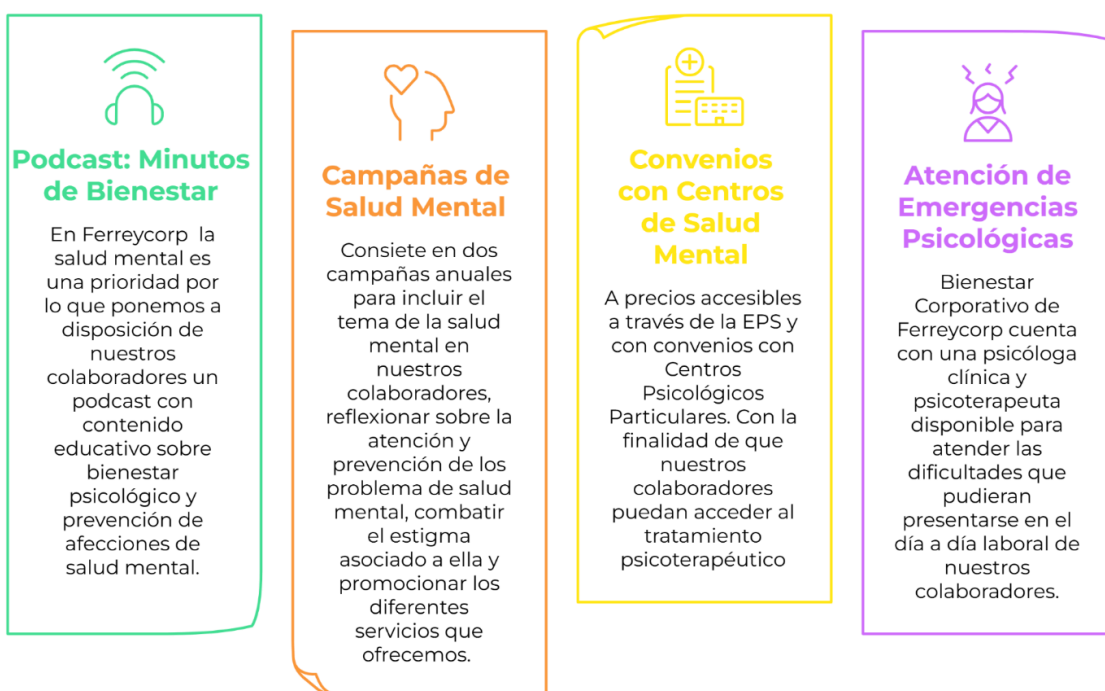
- **Podcast: "Minutes of Well-being":** Ferreycorp considers mental health a priority and provides employees with a podcast containing educational content on psychological well-being and the prevention of mental health conditions.
- **Mental Health Campaigns:** This involves two annual campaigns to include mental health as a topic for employees, encouraging reflection on mental health issues, combating associated stigma, and promoting the various services offered.
- **Agreements with Mental Health Centers:** Ferreycorp provides access to psychological and psychotherapeutic treatment at affordable prices through agreements with both

the EPS (an insurance provider) and private Psychological Centers. This ensures employees can access professional care.

- Psychological Emergency Care: Ferreycorp has a corporate psychologist and psychotherapist available to address any difficulties that may arise during an employee's workday.

Ferreycorp's approach to employee well-being is comprehensive, with a dedicated focus on mental health through various resources and support systems. The initiatives reflect a modern understanding of corporate responsibility, acknowledging the critical role of emotional and psychological health in overall productivity and quality of life.

Programas de Bienestar Salud Mental



ii) Physical Well-being Pillar

Ferreycorp's Physical Well-being Pillar encompasses a series of health-focused campaigns and services aimed at promoting the physical health of its staff. This pillar complements the emotional well-being initiatives by addressing the body's health, recognizing that physical and mental health are interconnected. The key components of this pillar include:

- Staff Health Campaigns: These are targeted campaigns focused on specific areas of health.
- Ophthalmological and Dermatological Consultations: The company emphasizes that "Your health is the most important" and offers consultations for eye and skin health, likely through agreements with specialists or on-site visits. These services are presented as a convenient way for employees to take care of their vision and skin.

- **Massage Campaign:** This initiative highlights the benefits of massages, such as improved circulation, stress reduction, and increased energy, positioning them as an investment in physical and mental well-being.
- **Breast Cancer Screening:** Ferreycorp shows its commitment to preventative care by offering in-person breast cancer screenings. This initiative underscores the importance of early detection and provides a tangible health service to its female employees.
- **Nutritional Counseling:** This is a dedicated service for employees to receive expert advice on their diet and nutrition.
 - The initiative promotes the idea that "Your nutrition and well-being are most important to us."
 - Employees are encouraged to register for nutritional assessments, which are available virtually via platforms like Google Meet, making the service accessible and convenient. This service positions healthy eating as a crucial investment in present and future health, aiming to boost energy, reduce disease risk, and improve overall quality of life.
- **Rimac Benefits Fair:** This is a broader event, likely in partnership with the insurance company Rimac, which offers various benefits related to well-being. The fair serves as a centralized event where employees can access different services and resources to enhance their health.

Consultorio Nutricional: Ferreycorp



Campañas de Salud: Staff Ferreycorp



iii) Social Well-being Pillar

Ferreycorp's Social Well-being Pillar focuses on fostering a positive and supportive community within the company, extending its initiatives to include employees' families. This pillar aims to create a sense of belonging and promote healthy relationships and a good work-life balance. Key programs within this pillar include:

1. "B for Benefits" Fridays: This initiative, branded as "Viernes con B de Beneficios," highlights corporate discounts available to employees. This program directly enhances employee social and economic well-being by providing access to special offers, thereby improving their purchasing power and quality of life beyond the workplace.
2. Iron Kids Program: This program is designed for the children of Ferreycorp employees, focusing on their health and development.

"FestiSalud KIDS": A health fair specifically for children, offering consultations in pediatrics, nutrition, ophthalmology, and dentistry, among other specialties. This event reinforces the company's commitment to the family unit and the health of the next generation.

Healthy Lunchbox Tips: The program also provides practical nutritional guidance for parents, offering tips and recipes for preparing healthy lunchboxes for their children, categorized by age groups (0-6 months, 6-11 months, and 12-23 months). This shows a detailed and thoughtful approach to family well-being.

3. Family Celebrations: Ferreycorp organizes events that strengthen family bonds and create a sense of community.

Children's Christmas: A celebration for employees and their families, with activities designed for a joyful and memorable day. This event, scheduled for December 15, is an important tradition that builds loyalty and goodwill.

Mother's and Father's Day Celebrations: The company acknowledges and celebrates the roles of parents, as shown by the campaigns "I learned with you to be a unique mom" and "I learned with you to be a unique dad." These celebrations, which include a gift pickup for Father's Day, reinforce the value the company places on family.

4. "Fun Vacations" Program: This initiative provides engaging activities and programs for the children of employees during school breaks. By offering "Vacaciones Divertidas," Ferreycorp helps parents manage childcare during holidays and provides children with enriching and entertaining experiences.

Programa Niños de Hierro: Ferreycorp



Celebración del Día de la Madre y Día del Padre: Staff Ferreycorp

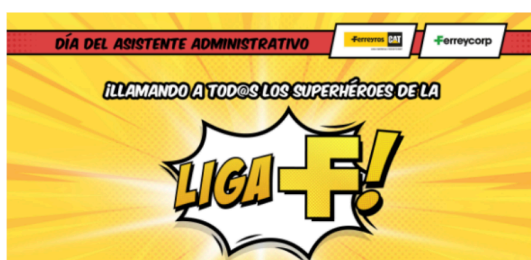


Vacaciones Divertidas: Ferreycorp



Actividades adicionales: Staff Ferreycorp

Día del Asistente



Vive la Experiencia Ferreyros



Navidad del Niño: Ferreycorp



Celebremos en familia

La alegría de la Navidad!

Nos reencontraremos este domingo **15 de diciembre** y te compartimos las recomendaciones a considerar para crear momentos inolvidables y vivir un día lleno de alegría

- Solo se permitirá el ingreso de las personas debidamente inscritas que presenten su **DNI o fotocheck**.
- Al ingresar, se les entregarán los **tickets de refrigerio y pulseras** para las actividades. Deberán ser cuidadosos, **ya que no serán repuestos**.
- Asistir con ropa cómoda, ligera y gorro. Los niños de preferencia con pantalón, para uso de juegos inflables.
- Llevar **protector solar**.
- Los padres **deben ser responsables del cuidado de los niños durante el evento**.
- Contaremos con ambulancia, a fin de atender cualquier emergencia.
- Se recomienda **no llevar autos**, ya que no contamos con parqueo.

De 2:00 p.m. a 6:00 p.m.

Deport Plaza Campo de Marte
Jr. Nazca S/N Jesús María Cdra. 3 de Salaverry

Si tienes alguna consulta comunícate con el área de bienestar y/o Recursos Humanos de tu empresa.

Ferreycorp Ferretos CAT UNIMAO Ferrenergy SOLTRAK FORBIS FARGO VIXORA

B de Beneficios: Staff Ferreycorp



Descuentos corporativos

iv) Financial Well-being Pillar

Ferreycorp Financial Well-being Pillar is represented by the "Pa' Lante" program. This initiative is designed to provide employees with the tools and support needed to start or grow their own entrepreneurial ventures. This pillar recognizes that financial stability and growth are crucial components of an employee's overall well-being.

The "Pa' Lante" program includes:

1. **Entrepreneurship Support:** The program offers employees the resources and knowledge to turn their business ideas into reality. It is positioned as a way to "start and grow your business." This is a significant benefit, as it goes beyond traditional salary and benefits to empower employees to build their own economic security.
2. **Tools and Resources:** The image shows that the program provides essential tools for entrepreneurship. While not explicitly detailed, the icons suggest it could include access to technology (laptops, printers), training, and a calendar for important dates, indicating a structured program of support.
3. **Celebrating Entrepreneurship:** Ferreycorp actively celebrates the spirit of entrepreneurship. The image shows a celebration for "Entrepreneur's Day," which highlights the company's pride in its employees' initiative and drive. This demonstrates a company culture that not only supports but also recognizes and honors the entrepreneurial endeavors of its staff.
4. **Community and Network:** The program fosters a community of entrepreneurs within the company. The imagery shows a collection of successful small businesses, suggesting a network where employees can share their successes and learn from each other.



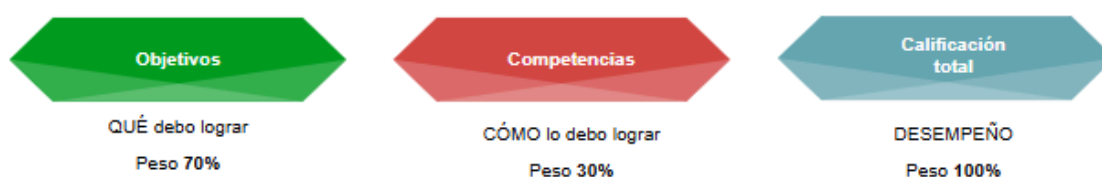
Individual Performance Appraisal by Company:

Sociedad	Suma total	Completado	% de avance
Ferreycorp Staff	209	207	99.09%
Ferreynos	4717	4716	99.98%
Unimaq	672	633	94.20%
Orvisa	130	130	100%
Forbis	128	127	99.22%
Fargoline	190	186	97.89%
Soltrak	372	372	100%

In the case of the general average for the entire Ferreycorp corporation, it is:

	2024
% of Performance Appraisals	98.63%

The performance management at Ferreycorp in 2024 is structured on a comprehensive methodology that combines the evaluation of results (the "what" to be achieved) with the analysis of behavioral competencies (the "how" these results are achieved). This duality is weighted in an evaluation formula that gives a weight of 70% to the objectives achieved and 30% to the demonstrated competencies, reflecting a balanced view between achievements and attitudes. In 2024, the implementation of this methodology achieved outstanding coverage in its various subsidiary companies, with progress percentages exceeding 94%, and even reaching 100% in companies such as Soltrak and Orvisa. These data show a high level of institutional commitment to the culture of evaluation and continuous improvement of human talent.



Workplace Climate

Below are some graphic pieces from the Workplace Climate Survey disseminated by Ferreycorp. These show the continuous effort to gather employee perceptions regarding the work environment and organizational commitment, through conducted surveys. The images

reinforce the invitation for employees to actively participate, ensuring the confidentiality of responses and fostering a culture of continuous improvement.



Encuesta de Clima Laboral 2024
Del 1 al 26 de julio

En Ferreycorp, creemos en el poder de la colaboración y la voz de cada uno de nuestros trabajadores. Por eso, queremos conocer tu opinión para seguir creando la mejor opción laboral para todos.

- 1 Ingresar con el número de tu documento de identidad (incluido cero).
- 2 Completar la encuesta con honestidad, tus respuestas son anónimas.
- 3 La encuesta dura menos de 15 minutos.
- 4 Encontrarás preguntas que evalúan tu área, tu empresa y a Ferreycorp como corporación.

Recuerda que participan los trabajadores que hayan ingresado hasta el 31 de marzo del 2024

[Completa la encuesta aquí](#)



Encuesta de Clima Laboral 2024
Del 1 al 26 de julio

¡Tus respuestas son 100% anónimas!

Tu opinión es importante y queremos que la compartas con total honestidad y confianza. Por eso, **aseguramos tu confidencialidad** al completar la encuesta.

Opinion honesta

[Revisa el compromiso de Mandü.](#)



Encuesta de Clima Laboral 2024
Última semana, hasta el 26 de julio

- 1 Ingresar con el número de tu documento de identidad.
- 2 Completar la encuesta con total honestidad, tus respuestas son anónimas.
- 3 Encontrarás preguntas que evalúan tu área, tu empresa y a Ferreycorp como corporación.
- 4 Participar los trabajadores que hayan ingresado hasta el 31 de marzo de 2024.

[Participa aquí](#) **Completa la encuesta desde cualquier dispositivo.**

In order to strengthen its organizational culture and promote more conscious and strategic work environments, Ferreycorp conducted a digital workplace climate assessment that achieved a 99% response rate, with 7,134 participating employees out of a sample of 7,204 surveyed. This exercise was designed with an analytical and segmented approach, considering variables such as area, gender, age, time in the company, and hierarchical category. The analysis structure included multiple key dimensions (from leadership and organizational culture to innovation, empowerment, and work environment), allowing for a detailed reading of the results based on the specific characteristics and needs of each group within the organization.

Muestra & Segmentos



As part of the comprehensive analysis of the workplace climate, Ferreycorp has incorporated a methodological roadmap that includes qualitative tools such as focus groups to enrich the understanding of the results obtained from the surveys. This structured process begins with the analysis of data from the Workplace Climate Survey (ECL), followed by the identification and coordination with key people from critical areas. Subsequently, focus group sessions are held with selected employees, and the information gathered is analyzed and synthesized into interpretive reports. Finally, an action plan is proposed based on the evidence collected, which allows for the design of more precise, participatory, and organizationally aligned interventions.



*Los tiempos se adaptarán de acuerdo a la demora de cada hito.

Moreover, the internal platform Mundo Ferreycorp is shown, a digital environment that facilitates employees' access to key information, such as corporate news, benefits, regulations, and daily-use tools. This intranet allows the dissemination of relevant announcements, calls for applications, and events, strengthening internal communication and active staff participation in the company's initiatives.

The "Meet Up Connect" event is an initiative that seeks to promote the exchange of ideas and open dialogue among Ferreycorp employees. In its April edition, a talk was held focused on the new skills needed to face the future of work, thus fostering a space for learning, active listening, and direct feedback with the teams.



¡Te invitamos al Mee Up de Abril!




Contaremos con una charla para conocer las **nuevas habilidades para el futuro del trabajo**.


**29**

Martes
29 de abril

 8:30 a. m.

 Sala **SUMS**


[Conócenos](#)
[Comunicándonos](#)
[Beneficios](#)
[Programas e Iniciativas](#)
[Normativas y Procesos](#)
[Herramientas](#)

















VI Concurso "El Mejor Operador": ¡Ya empezamos las inscripciones!







Vuelve el concurso «El mejor Operador de Equipo Pesado del Perú» con su 6ta edición y trae consigo un nuevo nivel de desafío para los operadores del Perú.







[Ver más](#)

Accesos directos


 Correo electrónico
  Ferreybook
  Canal de denuncias
  Portal TPI
  Gestión del Desempeño
  SSMA Seguridad, Salud y Medio Ambiente

 Espacio Google
  Pasa la Voz
  Activa
  Autoservicio de Windows
  Autoservicio de SAP
  ARES+

 Sistema de Gestión de Auditoría
  SAP
  FRED
  UN SOLO EQUIPO Orvisa
  Bravo Forbis
  ReconoSer Programa ReconoSer


 Bravo Orvisa
  XORA STARS Xora Stars
  XORA SIG Xora Sig
  buk Forbis BUK
  SSMART SSMART
  Sistema Normativo

Noticias




¿Ya realizaste tu Declaración Jurada de Conflicto de Intereses?

[Leer más](#)



Evento 8M: Empoderamiento Femenino en la operación de maquinaria pesada

[Leer más](#)



GENTRAC destaca a Nivel Global entre Distribuidores Caterpillar

[Leer más](#)

Ferreycorp has consolidated a structured annual process for evaluating the workplace climate, which is deployed in three interconnected stages: measurement, results analysis, and action plan execution. Measurement is carried out through the Mandü platform, allowing for systematic and digital data collection throughout the corporation. Once this process is completed, the results are visualized and presented in reports differentiated by company, identifying strengths and areas for improvement. Based on this information, Human Resources teams develop specific and transversal action plans, supervised monthly by Ferreycorp, with the aim of effectively responding to the detected needs and strengthening the employee experience.

Etapas del proceso de Clima Laboral



Training and Professional Development

Within the framework of its commitment to human talent development, Ferreycorp has implemented a comprehensive training management system aimed at enhancing its employees' competencies and strategically contributing to corporate objectives. This approach is based on the periodic identification of training needs, the development of individualized development plans, and the implementation of structured programs according to key competencies. Furthermore, various training modalities (in-person, virtual, and hybrid) have been incorporated with clearly defined goals. The following evidence allows for an understanding of how this strategy is systematically and measurably materialized within the organization.

Corporate Training Analytics

Corporate training at Ferreycorp is designed to enhance the skills and knowledge of collaborators, enabling them to contribute more effectively to the company's overall success. A key part of this is the analytics of training, which helps align corporate strategies and optimize the return on investment by identifying best practices, aligning training with corporate goals, and supporting decision-making in each company.

Participation and Coverage

Ferreycorp has consistently increased its training coverage and participation rate. The data shows a rising trend from 94.68% in 2022 to 96.73% in 2024, indicating that an increasing

number of employees are receiving training. The participation rate is high across all types of employees (general staff, FFVV (sales force), professionals, and technicians) consistently staying above 90% each year.

The company's commitment to broad coverage is also evident in the breakdown by subsidiary. The data shows that while some subsidiaries have consistently achieved 100% coverage, others have significant participation, demonstrating a wide-reaching effort to provide training across the entire corporation.

Modality and Providers

Ferreycorp has adapted its training delivery to modern needs, with a clear preference for virtual modalities. The number of courses offered virtually has grown significantly, from 1,154 in 2022 to 1,901 in 2024, highlighting a shift towards more flexible and accessible learning options. In-person courses have also increased, from 188 to 551, indicating a hybrid approach.

The company also relies more on external providers for its training needs. The number of courses from external providers increased from 1,187 in 2022 to 1,847 in 2024, while courses from internal providers decreased slightly. This indicates a strategy of leveraging specialized external expertise to offer a wider range of high-quality courses.

Types of Training

Ferreycorp's training programs are categorized into several key areas, targeting a wide range of competencies.

- **Role Skills:** Specific skills needed for optimal job performance (e.g., Cat Product Training for Sales Representatives).
- **Soft Skills:** Development of personal competencies like communication, teamwork, and time management.
- **Digital Skills:** Training focused on digital transformation and data analytics (e.g., Big Data Fundamentals).
- **Leadership Skills:** Programs designed to enhance strategic thinking and leadership capabilities for team leaders.
- **Regulatory:** Mandatory programs to ensure compliance with legal and corporate standards.
- **SSMA:** Compulsory programs related to safety, health, and environment.
- **PRO Programs:** Specialized programs for technical and professional development in specific areas.

General Training Data

The data provides a clear picture of the scale of Ferreycorp's investment in professional development.

- Number of Trained Employees: The number of employees receiving training has steadily grown, from 7,399 in 2022 to 8,644 in 2024.
- Total Training Hours: The total number of training hours has increased from 214,215 in 2022 to 288,224 in 2024.
- Number of Courses: The total number of courses offered has also grown, reaching 2,554 in 2024.

This sustained growth in all key metrics (trained employees, training hours, and courses) demonstrates Ferreycorp's strategic and continuous investment in its human capital, aligning employee growth with the corporation's strategic objectives.

APRENDIZAJE
Analítica de Capacitaciones

Capacitación Corporativa busca potenciar las habilidades y conocimientos de los colaboradores para que puedan contribuir de manera más efectiva al éxito general de la corporación.

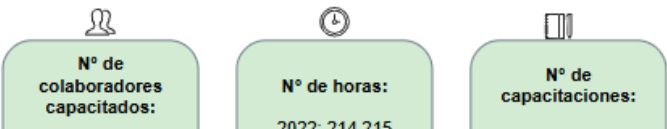
El análisis de capacitaciones a nivel corporativo nos ayuda a alinearlos con los objetivos estratégicos de la corporación y enfocamos en optimizar la inversión:

- Identificamos mejores prácticas
- Alineamos la capacitación con la estrategia corporativa
- Aportamos a la toma de decisiones de cada empresa

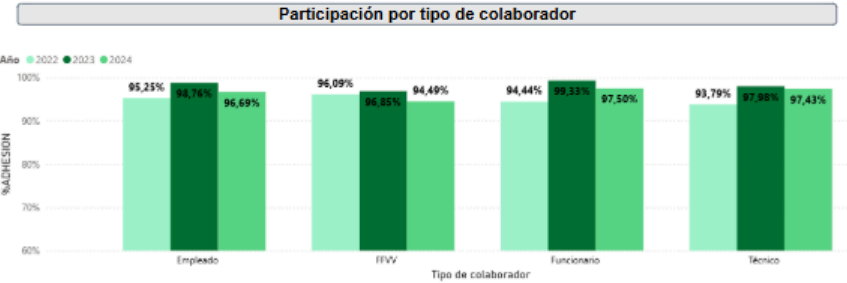
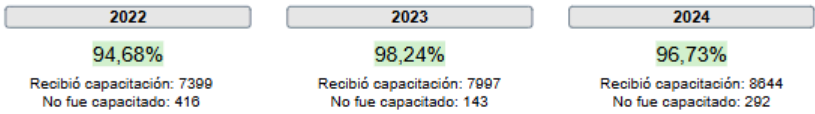
TIPOS DE CAPACITACIONES

	Tipo de Capacitación	Definición	Ejemplos:
	Habilidades de Rol	Cursos diseñados para fortalecer los conocimientos y habilidades específicas requeridas para un desempeño óptimo en el puesto actual.	- Capacitación Excavadoras CAT (Representante De Ventas) - Elevación Y Maniobra De Cargas (Supervisor De Operaciones De Campo)
	Habilidades Blandas	Formación orientada al desarrollo de competencias personales como comunicación, trabajo en equipo y manejo del tiempo.	- Gestión efectiva del Tiempo - Inteligencia Social - Programa Gestión del Cambio: Autoaprendizaje y trabajo en equipo
	Habilidades Digitales	Capacitación enfocada en transformación digital, análisis de datos y preparación para los retos tecnológicos del futuro.	- Big Data Fundamentals - Google Sheets (Básico - Intermedio - Avanzado) - Introducción al GCP
	Habilidades de Liderazgo	Cursos enfocados en potenciar competencias estratégicas y habilidades necesarias para liderar equipos con éxito.	- Liderazgo con Inteligencia Emocional - Mi Yo Líder y Pensamiento estratégico y visión de largo plazo - LiderazGO
	Regulatorias	Programas obligatorios a nivel corporativo que garantizan el cumplimiento de normativas legales y estándares internos.	- Ciberseguridad - Puntos + - Unidad de Inteligencia Financiera (UIF)
	SSMA	Programas obligatorios relacionados con seguridad, salud ocupacional y medio ambiente para asegurar entornos laborales seguros y sostenibles.	- Uso Seguro De Escaleras Y Protección Contra Caídas - Protección De La Radiación Solar Y Cáncer De Piel - Riesgos Psicosociales En El Trabajo
	Programas PRO	Formación especializada diseñada para el desarrollo técnico y profesional en áreas específicas.	- ACTUALIZACIONES DEL MOTOR C175 - ANALISIS DE FALLAS APLICADO A MOTOR - Cat Electric Power I

Datos generales de capacitación



Participación y cobertura

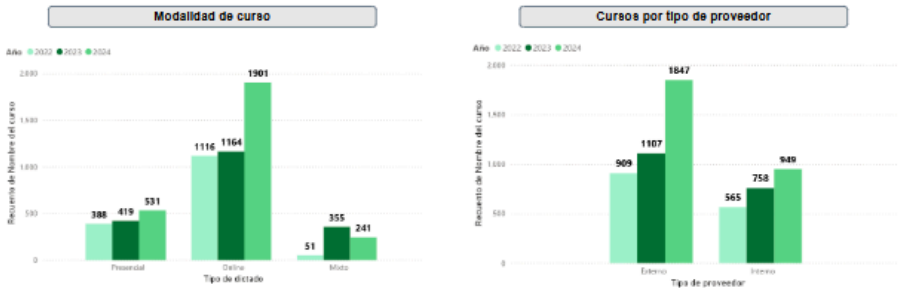


mentoring beneficios

Cobertura por empresa

Grupo de Empresa	Sociedad	Cobertura General			Cobertura Sin Regulatoria ni SSMA		
		2022	2023	2024	2022	2023	2024
Ferreycorp Staff	Ferreycorp	94.83 %	97.99 %	97.35 %	71,12%	75,17%	51,52%
	Asociación Ferreycorp	100.00 %	100.00 %	100.00 %	100,00%	71,43%	37,50%
Ferreiros	Ferreiros	95.76 %	99.94 %	99.87 %	63,83%	68,70%	73,50%
Ferrenegy	Ferrenegy	61.43 %	100.00 %	94.55 %	61,43%	64,62%	10,91%
Bienes de Capital y Soltrak	Unimaq	98.19 %	99.13 %	95.38 %	69,26%	81,32%	69,48%
	Orvisa	98.68 %	100.00 %	99.32 %	94,04%	92,25%	65,07%
	Trex Chile	97.97 %	89.09 %	81.71 %	42,57%	50,30%	41,14%
	Trex Colombia	99.20 %	73.91 %	86.67 %	72,00%	11,59%	45,00%
	Soltrak	90.49 %	97.81 %	92.65 %	76,70%	24,06%	47,85%
Logísticas	Fargoline	88.59 %	93.16 %	97.79 %	80,61%	65,40%	52,94%
	Forbis	87.59 %	96.21 %	91.28 %	71,72%	70,45%	58,40%
Centroamérica	Cogesa	89.95 %	99.52 %	97.66 %	20,10%	74,64%	49,53%
	Gentrac Guatemala	91.19 %	89.70 %	78.69 %	42,61%	72,63%	53,40%
	Motored Centroamérica	98.51 %	94.63 %	87.16 %	41,79%	39,02%	61,09%
Vixora	Vixora	80,85%	82,76%	96,8%	80,85%	31,03%	85,48%
Total general		94.68 %	98.24 %	96.73 %	63,88%	64,84%	67,44%

Modalidad y proveedor



- Mayor uso de la capacitación virtual
- Mayor porcentaje de proveedores externos
- Existen cursos que han sido dictados en múltiples modalidades, es decir, un mismo curso pudo haberse impartido tanto de manera presencial como virtual, ya sea porque se ofreció a diferentes grupos o en distintas temporadas.

Mentoring and coaching

The mentoring program developed by Ferreycorp constitutes a structured professional guidance strategy aimed at strengthening leadership and the comprehensive development of its employees. Through a guided process between experienced mentors and mentees selected for their potential and commitment, the organization facilitates spaces for dialogue, reflection, and strategic planning of professional growth. The initiative includes systematic sessions that are developed under an established schedule, with support materials and a monitoring platform in Classroom, promoting trusting relationships, continuous feedback, and meaningful learning. This proposal not only seeks to drive key competencies in the participants but also to strengthen an organizational culture of shared development.

¿QUÉ ES EL PROGRAMA

MENTORING?

Es una iniciativa destinada a **desarrollar y fortalecer las habilidades de liderazgo**, basado en el aprendizaje a través de otros, de su experiencia y la transferencia de conocimientos.

¿CÓMO FUNCIONA?

Junto a un líder experimentado (mentor (a)), el o la mentee **tendrá orientación, apoyo y consejos** en sus objetivos profesionales para alcanzar su máximo potencial a través de 9 a 12 sesiones de mentoreo.





¿POR QUÉ HE SIDO ESCOGIDO(A) COMO MENTEE?

- 

Potencial para crecer en la organización.
- 

Interesado(a) por su desarrollo.
- 

Referente para sus compañeros.



ROL DE TU MENTOR:



Facilitador para que el/la mentee encuentre sus respuestas.



Ejemplo a seguir (role model).



Transmite su experiencia.



Establece una relación laboral y personal.



Comparte sus valores y creencias.

El o la mentee es responsable de:

1



Dar seguimiento a su mentor para coordinar las sesiones.

2



Agendar las sesiones

3



Registrarlas en Classroom.

4



¡Sacarle el mayor provecho a las sesiones!



ASPECTOS IMPORTANTES:



Fechas:
1 año



Duración de sesiones:
aproximadamente 1.5 horas.



Modalidad:
pueden realizarse de manera virtual o presencial, de acuerdo a lo acordado con el mentor.



Número de sesiones:
Entre 9 y 12 sesiones (dependiendo del objetivo)


ESTRUCTURA DEL PROGRAMA

M	E	N	T	E	E
SESIÓN 1: Conociéndose, compartir trayectoria laboral, vivencias importantes, aspiraciones y expectativas para el programa.	SESIÓN 2: Empezando a descubrir nuestras fortalezas y oportunidades, FODA, ir definiendo objetivo a trabajar.	SESIÓN 3: Definición de objetivos para trabajar en el Programa.	SESIÓN 4: Priorización de fortalezas y oportunidades de mejora para poder definir un plan de acción para lograr el objetivo planteado.	SESIÓN 5-8/11: Seguimiento al plan y retroalimentación. Incluir sesión de revisión de avance.	SESIÓN 9/12: Sesión de cierre del mentoring, revisión final de avances y resultados.
 <p>Material •Romper el hielo •Conociéndonos</p>	 <p>Material •FODA</p>	 <p>Material •Estableciendo el objetivo</p>	 <p>Material •Estableciendo objetivos SMART</p>	 <p>Material •Estableciendo objetivos SMART •Seguimiento de objetivos</p>	 <p>Material •Check point de objetivos</p>

Labor Practices

Labor Conditions and Terms of Employment for Employees

The company is committed to establishing a framework of positive labor relations and ensuring the fulfillment of employees' rights. This includes maintaining an environment founded on the values of Integrity, Respect, Commitment, and Equity, with a firm adherence to both internal regulations and the labor legislation of each country where the Corporation operates. The document outlines key priorities and legal guidelines to ensure fair treatment, proper compensation, and a respectful and safe workplace for all employees.

	CORPORATE POLICY ON LABOR RELATIONS AND RIGHTS, AND LEGAL LABOR SUPPORT FOR THE CORPORATION'S COMPANIES	CODE	VERSION
		GEN-GCRH-NC-005	01
		INITIAL EFFECTIVE DATE	FINAL EFFECTIVE DATE
		01/01/2024	01/01/2027
PREPARING MANAGEMENT	CORPORATE HUMAN RESOURCES MANAGEMENT		
PREPARED BY	REVIEWED BY	APPROVED BY	
Mannie Tirado Comejo	Barbara Piza Dueñas	Maria Teresa Merino Caballero	
LEGAL ADVISOR	LABOR RELATIONS AND SSMA MANAGER	CORPORATE HUMAN RESOURCES MANAGER	

1. OBJECTIVE

The purpose of this corporate policy is to establish the general guidelines to be considered for the management of labor relations and the fulfillment of labor rights of employees in any of the national and foreign companies of Ferreycorp S.A.A (hereinafter the Corporation).

Likewise, it aims to establish the labor matters that must be channeled, coordinated, and/or handled with the legal labor support of the Labor Relations and SSMA Management of the Corporation.

2. SCOPE

This corporate policy applies to all companies of the Corporation.

3. CONTENT

This policy reinforces the Corporation's commitment to long-term business development through the establishment of positive relationships with its employees, in line with the Corporation's Organizational Culture, which demands strict compliance with legislation, the Corporation's Human Rights Policy, Code of Ethics, Internal Labor Regulations, and other guidelines for the development of our actions according to our values, principles, and norms.

4. INTRODUCTION

The Corporation has developed a culture based on the values of Integrity, Respect, Commitment, and Equity, with good faith being an indispensable condition in every professional labor relationship.

Furthermore, the Corporation recognizes that each employee has a personal and non-transferable

responsibility originating from the position they hold within the Corporation. Likewise, they have inalienable labor rights granted by current laws according to the contract under which the employment relationship was established.

For this purpose, the Labor Relations and SSMA Management has been designated as the exclusive corporate body to provide legal labor support for handling the Corporation's labor matters.

5. CORPORATE LABOR PRIORITIES

Companies must pay special attention to the following corporate priorities:

- All Corporation companies must fully comply with and respect the fundamental rights of individuals and the current labor legislation in the country where they operate.
- Any form of intolerance, harassment, or discrimination is considered a serious labor offense that will not be tolerated. The corresponding disciplinary measures will be applied. This provision must be applied at all levels and in all circumstances without exception. Victims of harassment or discrimination have labor protection during the investigation period and for up to 6 months afterward, unless they commit a serious offense.
- Every employee must comply with the Corporation's values of Integrity, Respect, Commitment, and Equity, with good faith being an indispensable condition in every professional labor relationship. This must be obeyed by each employee and is evidenced by conduct based on respect, trust, transparency, and honesty. Failure to comply with the values, principles, and legal and internal norms in general will result in the application of disciplinary sanctions based on criteria such as seriousness, recurrence, and others.
- The Corporation's companies must be governed by current regulations regarding the temporary hiring of personnel, applying reasonableness to define the type of contract that corresponds to each position, based on the type of business and activity it carries out.
- The management of the Corporation's subsidiary companies must maintain respectful, impartial, and equal treatment toward all their employees. All employees have the right to have open conversations with their superiors or colleagues.
- In case of disagreement between an employee and their superior or between two colleagues, each person must be able to be heard fairly. The involved parties should promote cooperation in their solutions through the established channels of communication. The human resources team must ensure that a disagreement is handled impartially and that each party can explain their point of view, regardless of their hierarchical level.
- Respect the Corporation's Salary Policy, which aims to manage compensation meritocratically and equitably, based on the company's salary management policies that define the criteria and regulation of employee compensation and benefits.
- Each company in the Corporation, through the corresponding heads of department and with the support of Human Resources managers, will be responsible in the first instance for ensuring the full development of labor relations at the appropriate level. They must coordinate with or request legal support, as the case may be, from the Corporate Labor Relations and SSMA department for any matter that requires their legal labor intervention, which will be carried out in accordance with legislation and implemented best practices.

6. FULFILLMENT OF LABOR OBLIGATIONS

The Corporation's companies and Human Resources managers must comply with and verify, among other things, the following:

- The correct and timely payment of salaries and any other type of economic compensation corresponding to their employees; as well as the payment of the labor benefits they are entitled to. Under no circumstances can a supervisor ask an employee to perform tasks related to their duties without compensation.
- The payment of taxes, contributions, and social security payments that apply to employees' income (Income Tax, Social Health Security, Pension Systems, etc.).
- Compliance with all labor legal obligations stipulated in our Peruvian labor legislation, International Conventions, and other regulations binding on the Corporation's companies.

7. LABOR MATTERS HANDLED BY THE LABOR RELATIONS AND SSMA MANAGEMENT

The Labor Relations and SSMA Management is in charge of providing legal labor support to all companies of the Corporation, being responsible for validating compliance with current labor regulations by each of the Corporation's companies, as well as identifying possible legal contingencies that may arise in labor relations.

In this sense, the exclusive matters handled by the Labor Relations and SSMA Management are the following:

- Disciplinary procedures for serious and very serious offenses.
- Inspections initiated by the Labor Inspection Authority.
- Labor lawsuits initiated by employees or third parties in which the company is sued directly or as a jointly and severally liable third party.
- Contractually formalizing changes in the variable compensation system of employees.
- Advice on compensation and salary management matters.
- Establishment of regulations governing the labor relationship.
- Any type of labor claim that is notified to the Corporation's companies or to client companies regarding the Corporation's employees.
- Complaints made through the Corporate complaint channel that include matters of a labor nature.
- Judicial retentions to company employees.
- Any type of communication that modifies the working conditions of employees.
- Signing of employment contracts with employees, service providers, and/or third-party labor intermediation and outsourcing companies.
- Advice on all cases of sexual harassment and workplace hostility.
- Advice for the hiring of foreigners and immigration procedures.
- Advice and management regarding any matter of a labor nature.


8. TREATMENT AND COLLECTIVE BARGAINING

- The Corporation recognizes the freedom of association of its employees and the right to collective bargaining within the local legal framework.
- The Corporation promotes direct and frequent communication in the workplace between the representatives of our company and our employees, whether or not they are affiliated with unions.
- While dialogue with unions is essential, it does not replace the close relationship that our management must maintain with employees.
- We promote a dialogue with our employees that goes beyond the traditional aspects of collective bargaining, in order to share knowledge and jointly find opportunities related to other important work matters, such as health and safety in the workplace, and our concern for the environment.
- When collective bargaining takes place, it will:
 - Be established within the legal framework of each country.
 - Be fair and constructive, and based on the principle of good faith and open exchange of information.
 - Refer to relevant working conditions, such as salaries, benefits, and the exercise of union activities within the margins of pay equity.
 - Focus on achieving common interests to improve both our competitive advantages and the workplace.
 - Take into account the economic situation of the company and the country.
- It is expected that the Company and the employee representatives will make all necessary efforts to conduct fair and constructive negotiations, overcome any difficulties they may encounter, reach sustainable agreements, and implement them.

It is emphasized that everything related to the rights and labor relations of the Corporation's employees must be developed in coordination with the Labor Relations and SSMA Management of Ferreycorp S.A.A., and if applicable, must have the approval of the Corporate Human Resources Management of Ferreycorp S.A.A. before being initiated.

Ferreycorp has established a comprehensive and transparent compensation policy that is based on pay equity as a strategic pillar of its organizational culture. The central objective of this policy is to ensure that the compensation of all employees is fair and equitable, without distinction of gender, race, or any other characteristic, and that it is based exclusively on objective criteria. This approach not only complies with current legal regulations, such as Law No. 30709, but also reinforces the company's commitment to equal opportunity and non-discrimination. By fostering a fair and meritocratic compensation system, Ferreycorp actively seeks to attract, develop, and retain the best talent in the market, aligning its human resources practices with the highest standards of corporate sustainability.

To ensure consistency and objectivity, Ferreycorp's policy is based on a robust job evaluation methodology. This methodology allows for the determination of the relative value of each position within the organization, ensuring that equivalent compensation is granted for roles with similar responsibilities and competencies. Furthermore, the company evaluates its external competitiveness by analyzing market salary studies, which guarantees that its compensation packages are attractive and in line with industry trends. In this way, Ferreycorp demonstrates its commitment to both internal and external equity, creating a remuneration structure that fairly rewards the performance, experience, and skills of its employees.

	SALARY POLICY OF FERREYCORP S.A.A.	CODE	VERSION
		GEN-GCRH-NG-002	02
		INITIAL EFFECTIVE DATE	FINAL EFFECTIVE DATE
		01/01/2024	31/12/2025
PREPARING MANAGEMENT	HUMAN RESOURCES MANAGEMENT – FERREYCORP S.A.A.		
PREPARED BY	REVIEWED BY	APPROVED BY	
Ana Hirakawa Shirakawa / Bárbara Pita	Maria Teresa Merino	Mariela Garcia	
DEPUTY MANAGER OF TALENT AND COMPENSATION / MANAGER OF LABOR RELATIONS AND SSMA	GERENTE CORPORATIVO DE RECURSOS HUMANOS	GERENTE GENERAL	

1. OBJECTIVE

At Ferreycorp, we firmly believe in pay equity as a fundamental component of our organizational culture. The main objective of this policy is to ensure that the company's employees are compensated equitably, regardless of gender, through a compensation management system based on meritocracy and equity, with objective criteria, in line with labor compensation and benefits regulations. This aims to attract and retain talent to fulfill Ferreycorp S.A.A.'s purpose (hereinafter, "the Company"), in accordance with corporate salary guidelines and Law No. 30709 on Equal Pay and its regulations.

2. SCOPE OF THE POLICY

This general rule applies to all employees of the Company.

3. GENERAL PRINCIPLES

- **Meritocracy:** Performance is the central axis for the integral development of employees within the organization.
- **Equality and non-discrimination:** All employees, without any distinction, have the right to equality and non-discrimination. Discriminatory treatment is not permitted in any aspect of the employment relationship, including the compensation and benefits structure. Differences may only be based on objective criteria. Any distinction, exclusion, or preference based on race, sex, religion, opinion, social origin, economic status, marital status, age, or any other factor that nullifies or alters equality of opportunity or treatment in employment is prohibited.
- **Equity and Competitiveness:** We aim to grant equivalent compensation and benefits for positions with similar value within the Company (internal equity) and consider relevant external labor market references (salary market studies).
- **Performance Evaluation:** The Company has an internal performance evaluation model adapted to the nature of the functions and objectives of employees, aimed at measuring and managing performance, promoting continuous improvement, and fostering a culture of constant feedback. The competencies to be evaluated are communicated in a timely manner.
- **Bias Elimination:** The Company will implement measures to eliminate bias in setting pay, ensuring that factors such as race, sex, religion, opinion, social origin, economic status, marital status, age, or any other reason that could nullify or alter equality of opportunity or treatment in employment do not influence salary decisions.

4. DEFINITIONS

Employee: A natural person who, regardless of sex, race, religion, sexual preference, or any condition, performs paid, subordinate work for the Company under an employment contract.

Remuneration: Compensation received by an employee for the performance of their services, either monetary or in kind.

Total Compensation: Includes fixed and variable pay (if applicable), plus other monetary and non-monetary benefits offered to the employee.

Salary Grade: Resulting from job evaluation based on the relative importance of positions to the organization.

Compensation and Benefits System: The Company's strategy for rewarding employees through total compensation aligned with corporate objectives.

5. COMPENSATION AND BENEFITS SYSTEM

5.1. Elements of Compensation and Benefits Management

The main elements of compensation and benefits management are:

- Salary policy
- Job evaluation methodology
- Objective criteria
- Internal equity and external competitiveness
- Fixed and variable remuneration
- Complementary benefits
- Market surveys

5.2. Objective Criteria to Determine Pay

As per Law No. 30709, the Company applies the following criteria individually or jointly, depending on the position:

- i) Company budget and financial statements
- ii) Seniority in the Company or years of service in the position
- iii) Performance management
- iv) Collective bargaining agreements
- v) Scarcity of labor and/or specialization
- vi) Work experience
- vii) Academic or educational profile
- viii) Talent attraction and/or retention
- ix) Working conditions
- x) Others

5.3. Internal Equity

Positions with the same value must have the same salary grade:

- Clear job evaluation methodology from a recognized consultant
- Classification of positions into salary levels forming the Company's pay structure
- Remuneration must correspond to the established salary level

- Job evaluations must be updated according to the organizational structure

5.4. External Competitiveness

The compensation and benefits system may take external competitiveness or the market as a reference.

To this end, the Company will have access to or participate in compensation surveys with specialists in the field to obtain information that allows assessing the Company's position in the market.

5.5. Fixed Remuneration:

This is the base compensation granted to the employee for performing the services of the assigned position.

5.6. Variable Remuneration

Commercial positions may be subject to a variable compensation system based on the achievement of certain objectives and goals established by the company. This system is evaluated continuously and is subject to the Company's budget, market conditions, sales, salary levels, and the characteristics and definitions of the business.

5.7. Complementary Benefits

Complementary and occasional items granted conditionally in special situations related to the position, such as work location, retention due to working conditions, productivity, and others.

5.8. Determination of Remuneration

The pay structure of each employee is set by the Company, based on the nature of their duties and the corresponding level.

Employees belonging to the same level and relative value of the position (grade) may receive different remuneration according to the criteria set forth in section 5.2 of this document.

It will be applied in the current Processes and/or Programs that require a salary analysis.

- Hiring
- Specific Technical Training Program
- Salary Review Process

5.9. Criteria for Establishing Increases

The following guidelines will be considered when granting increases:

- In order to implement increases, the Company must conduct a financial analysis and prepare an annual budget for salary increases when developing its business plan.
- Prior to executing the salary increase, the Company must have the approval of the General Manager, who will take into account the financial results at that time.
- Internal promotions.
- Performance evaluations.
- Market variations.

6. JOB EVALUATION METHODOLOGY

To design its structure and salary policy, the Company relies on a factor-based point job evaluation

system, whose methodology consists of assigning points (dimensions of responsibility and influence on organizational impact). In this way, the salary structure is organized into levels and salary grades assigned to positions within the organization.

The Company reserves the right to modify the job evaluation method. In this regard, the method may be changed whenever the Company deems it appropriate, using objective factors for such modification.

Likewise, in exercising its management authority, the Company is entitled to define the scope of the employee's service delivery, within reasonable limits and respecting the principle of non-discrimination in pay.

6.1 Position Evaluation Methodology

The position evaluation methodology is a systematic process for classifying jobs logically and objectively, comparing them to each other or to a pre-established scale to determine their relative importance within an organization.

6.2. Criteria for Evaluating Positions

The criteria considered within the methodology are based on three main factors:

1. Know-how (Competence) – The total sum of skills, knowledge, and experience required for a position.
2. Problem Solving – The intensity and complexity of the analytical process required by the position when identifying and defining problems, drawing conclusions, and expressing them.
3. Responsibility for Results – Being accountable for an action and its consequences

6.3 Distribution of Salary Levels

As a result of applying the position evaluation methodology, groups of positions are defined according to the table of levels and functions, as follows:

Occupational Groups	Associated Positions
Level 1	Deputy Managers / Managers
Level 2	Heads / Officer / Executive
Level 3	Advisors / Auditors / Specialists / Coordinators / Supervisors
Level 4	Analysts
Level 5	Assistants
Level 6	Auxiliaries / Junior Assistants

For job evaluation purposes, the levels will be broken down into salary grades.

7. ROLES AND RESPONSIBILITIES

7.1. General Management:

Defines, together with the Human Resources Management, the vision for managing compensation and benefits, and ensures the necessary resources for its implementation, in accordance with

corporate guidelines.

7.2. Human Resources Management

- Administer the execution of the salary plan.
- Ensure that job evaluations reflect any changes in the functions and responsibilities of existing positions in the Company, the creation of new positions, among others.
- Ensure that managers inform the employee in advance when there is any modification to their compensation package, once authorized by the General Manager.

7.3 Management Positions

Managers, department heads, and supervisors will be responsible for ensuring that this salary policy is applied.

8. ADDITIONAL CONSIDERATIONS

8.1. Measures adopted by the Company to prevent temporary incapacity for work from having an adverse impact

Periods of temporary incapacity for work (pregnancy, maternity leave, paternity leave, adoption, or assumption of family responsibilities), breastfeeding leave, or leave for being a victim of violence (in accordance with Law 30364) are considered as effectively worked time, in line with current regulations.

8.1. Training

The Company has established, in accordance with its internal policies, training programs aimed at developing and/or enhancing the skills of our employees so they can perform adequately in their positions.

8.2 Promotions

The promotion of employees is an inherent right of the Company, exercised based on objective and reasonable criteria.

Under the general guidelines, job opportunities are open to any employee of the Company. Job opportunities include the position requirements and the profile that ensures good performance in the role.

8.3 Responsibilities

The Company's primary interest is the development of all activities necessary to achieve its goals and objectives, with special attention to the protection of its human resources as well as its material resources, and is therefore committed in all its activities to proper risk management.

The administration of employee remuneration is a fundamental component for achieving the Company's goals and objectives; therefore, any attempt to breach or undermine the guidelines established in this Policy will not be permitted.

8.5. Confidentiality

The compensation information of the Company's employees is strictly confidential and personal.

Each employee may only discuss their compensation with their direct supervisor, the next higher level, or the persons responsible for it within the Human Resources Management.

The disclosure of this information will be considered a serious offense and may result in disciplinary sanctions, including dismissal.

8.6. Exceptions

Any exception to the provisions established in this policy regarding job evaluations or re-evaluations and the determination of salaries or increases must be approved by the appropriate authorities.

Likewise, the Company has the authority to maintain an employee's remuneration in the event of organizational restructuring, reclassification, demotion, or reasonable adjustment.

8.7. Equal Pay Plan

The Company conducts a periodic review of discrepancies and/or gaps in compensation and benefits in accordance with the law, in order to resolve any distortions that may exist. Salary adjustments may be applied for individual or collective reasons, taking into account internal and external pay equity standards.


9. FINAL PROVISIONS

This policy is a dynamic instrument; therefore, the guidelines established herein may vary in response to internal changes within the Company, such as job and function reorganization, restructuring of areas, among others, or due to external changes, such as market variations.

Accordingly, the Company reserves the right to change, modify, and/or eliminate the criteria and guidelines of this policy at any time it deems appropriate, establishing that these are not fixed in any way, regardless of their repetition in subsequent periods.

Thus, it is established that the conditions of this Policy will be reviewed periodically, unless unforeseen economic or market events arise that make it essential to implement immediate changes or do so more frequently. Should changes occur, they will be communicated to employees. For this purpose, factors such as the budget, financial statements, sales levels and costs, commercial activity, or the Company's economic segment, among others, will be taken into account to meet corporate objectives.

Annex 1: CORPORATE COMPLIANCE MANUAL

	CORPORATE COMPLIANCE MANUAL	CODE	VERSION
		GEN-GCAC-MCO-01	08
		INITIAL EFFECTIVE DATE	FINAL EXPIRATION DATE
		01/10/2019	31/12/2027
PREPARING MANAGEMENT	CORPORATE AFFAIRS CORPORATE MANAGEMENT		
ELABORATED BY	REVIEWED BY	APPROVED BY	
María del Carmen Blume	Eduardo Ramírez del Villar	Mariela García de Fabbri	
DEPUTY COMPLIANCE MANAGER	CORPORATE AFFAIRS MANAGER	GENERAL MANAGER	

1. OBJECTIVE:

The purpose of this Corporate Compliance Manual (hereinafter, the “Manual”) is to explain the functioning of the Compliance System as a whole (hereinafter, the “CS”) of the Corporation (understood as Ferreycorp S.A.A. and its subsidiaries), and to promote compliance with the various regulations that form part of the system (policies, standards, and procedures), ensuring compliance with current laws and their proper application within the context in which the Corporation carries out its activities.

2. REFERENCE OR ALIGNMENT: SYSTEM ELEMENTS

This Manual is related or aligned with all documents that form part of the CS (Documentary Structure, which incorporates policies, standards, procedures, and other complementary documents, such as the Corporate Compliance Policy, the Code of Ethics, the risk matrix, among others).

3. SCOPE:

This Manual applies to all subsidiaries, their divisions, management offices, and departments, as well as to the processes, business decisions, and actions of Employees (understood as directors, managers, officers, employees, and other workers including interns of the entire Corporation).

4. CONTENT OF THE MANUAL:

This Manual is issued in compliance with each requirement of the ISO 37001:2016 standard and the applicable legislation in force.

1. INTRODUCTION

At the Corporation, we are committed to maintaining an ethical culture grounded in values. In this regard, we require both our Employees and our business partners (clients, suppliers, partners, allies, consortia, contractors, subcontractors, agents, distributors, intermediaries) to uphold at all times ethical behavior aligned with the Corporation's culture and values, emphasizing strict compliance with the law and a zero-tolerance approach toward acts of bribery, collusion, influence peddling, money laundering, terrorist financing, private-sector corruption, accounting offenses, archeological crimes, tax crimes, customs crimes established in Article 1 of Law No. 30424 (hereinafter, the "Offenses"), with the purpose of building and maintaining over the years a solid culture based on the prestige and good reputation earned over nearly 100 years of business activity, achieved through our relationships with the various stakeholders.

This Manual sets forth the compliance requirements demanded by the Corporation's CS, applicable to all its areas and Employees. In addition, it aims to foster compliance with the applicable legislation governing the Corporation and to establish the foundations of the crime prevention model referred to in Law No. 30424 and its regulations.

2. NORMATIVE REFERENCES:

- Law No. 30424: Law Regulating the Administrative Liability of Legal Entities in Criminal Proceedings.
- Legislative Decree No. 1352: Expands the Administrative Liability of Legal Entities.
- Law No. 30835: Law Amending the Title and Articles 1, 9, and 10 of Law No. 30424.
- Law No. 31740: Law Regulating the Administrative Liability of Legal Entities, strengthening anti-corruption regulations applicable to legal entities and promoting good corporate governance.
- Supreme Decree No. 002-2019-JUS: Regulations of Law No. 30424.
- Legislative Decree No. 635 – Criminal Code.
- ISO 37001:2016 Standard – Anti-Bribery Management Systems – Fundamentals and Vocabulary.
- Legislative Decree No. 1385: Criminalizes Corruption in the Private Sector.
- SMV Resolution No. 006-2021-SMV/01: Guidelines for the Implementation and Operation of the Prevention Model.

3. TERMS AND DEFINITIONS:

- Governing Body: The Board of Directors of Ferreycorp S.A.A.
- Senior Management: The General Manager of each subsidiary.

4. ORGANIZATIONAL CONTEXT

4.1 Understanding the Organization and its Context

The Corporation identifies internal issues such as the size, structure, scale, and complexity of the organization and its operations, as well as external issues such as the company's interactions with the market, which are relevant to the purpose and strategic direction of the Corporation and that affect its ability to achieve the intended results of the Compliance System. This analysis is documented in each company's Environmental Analysis Matrix (see Annex 1) and is reviewed at least once a year or when any of the following circumstances arise:

- New or significantly modified activities, products, or services.
- Changes in the structure or strategy of the Corporation.
- Significant external changes, such as economic and financial circumstances, market conditions, liabilities, and customer relations.
- Changes to and/or noncompliance with the obligations of the Compliance System (CS).

4.2 Understanding the Needs and Expectations of Stakeholders

The Corporation has identified its stakeholders, which include shareholders, employees, suppliers, clients, the state, and society, among others, that are relevant to the Compliance System, as well as their requirements, expectations, and all applicable legal, regulatory, contractual, and other obligations.

For the monitoring and review of the needs and expectations of stakeholders relevant to the Compliance System, each company's Stakeholder **Matrix was used (see Annex 2).**

4.3. Determination of the Scope of the Compliance System (CS)

The scope of the Corporation's Compliance System is as follows:

"Ferreycorp and each of its subsidiaries implement the Compliance System across all their processes, taking into account their context, the requirements and expectations of their stakeholders, as well as the main risks, in their facilities nationwide." (see Annex 3).

The Corporation's Compliance System (CS) is based on the model specified by ISO 37001:2016, in accordance with Law No. 30424, its amendments, and its regulations, and is used to prevent, detect, and address Offenses, as well as to ensure compliance with the applicable legal requirements in force for the Corporation.

4.4. Compliance System

The Corporation establishes, implements, and continuously improves its CS in line with ISO 37001:2016, through the process maps defined for each subsidiary (see Annex 4).

4.5. Risk Assessment of Offenses

The Corporation has carried out the identification and assessment of risks and opportunities according to the nature of its processes and their associated requirements, taking as reference the Corporate Risk Management Policy and the GEN-GCAC-PRC-002 Corporate Risk Management Procedure, in which the criteria for evaluating the level of risk of Offenses are established.

Furthermore, for the identification, analysis, evaluation, and monitoring of CS risks, the following documents were used:

- SGX-01 Risk Matrix – Ferreyros
- SGX-02 Risk Matrix – Ferreycorp
- SGX-03 Risk Matrix – Fargoline
- SGX-04 Risk Matrix – Soltrak
- SGX-05 Risk Matrix – Ferrenergy
- SGX-06 Risk Matrix – UNIMAQ
- SGX-07 Risk Matrix – Orvisa
- SGX-10 Risk Matrix – Forbis
- SGX-11 Risk Matrix – Vixora

5. LEADERSHIP

5.1. Leadership and Commitment

Both the Governing Body (Board of Directors of Ferreycorp S.A.A.) and Senior Management (General Manager of each subsidiary) play a fundamental role in the establishment and implementation of the CS, being ultimately responsible for its development, implementation, and continuous improvement. To this effect, the following responsibilities are established for each of them.

Responsibilities of the Governing Body, represented by the Board of Directors of Ferreycorp S.A.A.:

- Approve the Corporate Compliance Policy, ensuring that it is aligned with the Corporation's strategy.
- Receive and periodically review information regarding the content and functioning of the Corporation's CS.
- Provide the necessary resources for the effective operation of the Corporation's CS.
- Periodically review the development and effectiveness of the CS, as well as the necessary improvements to be undertaken.
- Receive and periodically review information regarding the operation and irregularities of the CS.

Responsibilities of Senior Management, represented by the General Manager of each subsidiary:

- Ensure that the CS, including the Corporate Compliance Policy and objectives, are established, implemented, maintained, and periodically reviewed to adequately address the risks of Offenses that may affect the Corporation.
- Ensure the integration of CS requirements into the Corporation's processes and allocate sufficient and

- appropriate resources for its effective functioning.
- Communicate internally and externally matters related to the Corporate Compliance Policy, emphasizing internally the importance of effective compliance management and conformity with CS requirements.
- Ensure that the CS is properly designed to achieve its objectives and promote continuous improvement.
- Support the Corporate Ethics and Compliance Officer in achieving success in their role, contributing to the effectiveness of the CS.
- Support other relevant roles (managers) in demonstrating leadership in the prevention and detection of Offenses, as applicable to their areas of responsibility.
- Promote the use of established procedures and channels to report suspected or actual cases of Offenses.
- Ensure that no Employee will suffer retaliation, discrimination, or disciplinary measures for making a report or complaint in good faith or on the basis of a reasonable belief that a violation or suspected violation of the Corporate Compliance Policy has occurred. Likewise, no Employee will suffer retaliation, discrimination, or disciplinary measures for refusing to participate in an act that could reasonably result in the commission of an Offense, even if such refusal may lead to a loss of business for the Corporation.
- Report periodically to the Board of Directors of Ferreycorp S.A.A. on the content and functioning of the CS and on any relevant and/or systemic complaints that may arise as a result of monitoring.

5.2. Corporate Compliance Policy

The Board of Directors of Ferreycorp S.A.A. establishes, implements, and maintains a policy for the CS that:

- Prohibits Offenses and furthermore requires and promotes compliance with the national laws applicable to the Corporation.
- Provides a reference framework for the establishment, review, and achievement of compliance objectives.
- Commits to fulfilling the requirements of the CS.
- Promotes the raising of concerns or good-faith reports with confidence and without fear of retaliation.
- Seeks the continuous improvement of the CS.
- Recognizes the authority and independence of the Corporate Ethics and Compliance Officer.
- Explains the consequences of non-compliance with the Corporate Compliance Policy.

5.3. Roles, Responsibilities, and Authorities within the Organization

5.3.1. Roles and Responsibilities

The General Manager of each subsidiary ensures that the responsibilities and authorities defined for each role or function are assigned, communicated, and understood throughout all

levels of the Corporation.

The Board of Directors of Ferreycorp S.A.A., the General Manager of each subsidiary, and every Employee of the Corporation shall understand, comply with, and apply the requirements of the CS in relation to their respective functions within the Corporation.

5.3.2. Compliance Function

The Board of Directors of Ferreycorp S.A.A. has appointed a Corporate Ethics and Compliance Officer, who assumes the responsibility and authority to:

- Continuously drive and monitor the implementation and effectiveness of the CS across the different areas of the Corporation.
- Provide advice and guidance to Employees regarding the CS and matters related to Offenses.
- Ensure that the CS complies with the requirements set forth in this Manual.
- Report on the performance of the CS to the Board of Directors of Ferreycorp S.A.A. and the General Manager of each subsidiary, as applicable.

The Corporate Ethics and Compliance Officer has direct and prompt access to the Board of Directors of Ferreycorp S.A.A. and to the General Manager of each subsidiary to raise any issue or concern that needs to be escalated to such bodies in relation to Offenses or the CS.

5.3.3. Delegation of Authority

The Board of Directors of Ferreycorp S.A.A. delegates the authority to oversee the CS to the Corporate Ethics and Compliance Officer regarding the risks of Offenses that have been classified as low, medium, high, or very high in the risk matrices.

If a risk materializes and a decision must be made regarding it, the Corporate Ethics and Compliance Officer shall make the decision jointly with the General Manager of the corresponding subsidiary. In case of a conflict of interest, the matter shall be escalated to the subsidiary's Board of Directors.

6. PLANNING

6.1 Actions to Address Risks and Opportunities

The Corporation considers it essential to identify, analyze, and assess the risks of Offenses, and to develop an appropriate strategy that allows the adoption of necessary measures to address such risks. This ensures that the CS achieves its objectives by preventing and/or reducing undesired effects that may undermine the policy and objectives of the CS, monitoring the effectiveness of the CS, and

achieving its continuous improvement.

The Corporation plans the necessary actions to address these risks and implement improvement opportunities, integrating such actions into the processes established in the CS. Likewise, it evaluates the effectiveness of each of these implementations.

To determine, assess, and establish actions to address risks and improvement opportunities, each company uses the Crime Risk Matrix and the Opportunities List. The processes for identifying, assessing, and analyzing crime risks are detailed in the document "GEN-GCAC-PRC-002 Corporate Procedure for Compliance System Risk Management."

6.2. Compliance Objectives and Planning to Achieve Them

The Corporation establishes the objectives of the CS based on the identified risks, consistent with the Corporate Compliance Policy. These objectives must be measurable and achievable, and are communicated and updated as appropriate.

To achieve and monitor the objectives of the CS, the document entitled "CS Objectives Plan and Monitoring" is used.

7. SUPPORT

7.1. Resources

Within the Corporation, the Crime Risk Matrix of each subsidiary identifies the controls, tasks, and resources assigned to each risk, which are necessary to achieve the established objectives.

With respect to human resources and the competencies required of Employees, including specific controls (due diligence) and their training and awareness, the Corporation follows the criteria set forth in the Corporate Due Diligence Standard for Clients, Suppliers, and Employees.

The Corporation maintains an annual budget to cover the expenses of activities related to the CS. It also identifies in its accounting records the expenses effectively allocated to it.

7.2. Competence

The Corporation determines the level of competence required of Employees whose work impacts the performance of the CS. Where applicable, actions are taken to acquire and maintain the necessary competencies, and the effectiveness of such actions is evaluated in relation to the performance of their duties.

The Corporation ensures that Employees are competent based on appropriate education, training, or experience, as described in the Functions Manual and/or job description and/or job profiles.

Furthermore, compliance with the guidelines established in the Corporate Due Diligence Standard for Clients, Suppliers, and Employees is required.

7.3. Awareness and Training

The Corporation promotes awareness, knowledge, and training regarding the CS, which is appropriate and relevant for Employees, emphasizing the zero-tolerance approach toward Offenses.

It recognizes that the purpose of training is to ensure that Employees understand, in accordance with their function and responsibility within the Corporation, the risks of Offenses that they and the Corporation may face.

The Corporation also facilitates awareness, training, and knowledge among its business partners (clients, suppliers, partners, allies, consortia, contractors, subcontractors, agents, distributors, intermediaries) who pose more than a low risk (i.e., medium, high, or very high) regarding Offenses.

7.4. Communication

The Corporation defines how relevant internal and external communications will be carried out, through the communication channels established by the Corporation (corporate email, Intranet, Legal and Compliance Site, Enfoque Ferreycorp Magazine, website, social media, training sessions, meetings, among others), as established in the document “GEN-GCAC-PRC-007 Corporate Procedure for Compliance System Communications.”

7.5. Documented Information

The Compliance Management System includes:

- Documented information required by Peruvian legislation;
- Documented information recommended by ISO 37001:2016;
- Documented information that the Corporation determines as necessary for the effectiveness of the CS.

In addition, it follows the criteria established in the “Corporate Procedure for Document and Record Control of the CS.”

8. OPERATION

8.1. Planning and Operational Control

The Corporation plans, implements, reviews, and controls the necessary procedures to comply with the requirements of the CS, through the ongoing monitoring of the Risk Matrix, which considers:

- a) The establishment of criteria for corporate procedures and standards;
- b) The implementation of procedure controls;

- c) The custody of documented information as necessary, to ensure that procedures have been carried out as planned.

These corporate procedures and standards include the specific controls referred to in sections 8.2 to 8.10.

Likewise, the Corporation controls planned changes and reviews the consequences of unforeseen changes, taking action to mitigate any adverse effects, as necessary.

8.2. Due Diligence

As part of the due diligence process, the nature and scope of the risk (risk level) of Offenses must be assessed in relation to:

- a) Certain categories of operations, projects, or activities;
- b) Existing or planned relationships with specific categories of business partners; or
- c) Specific categories of Employees in certain positions.

This assessment must cover all elements necessary to obtain sufficient information to evaluate the risk of committing such Offenses.

Due diligence will be updated in follow-up meetings, in which changes and new information that may be relevant will be taken into account.

The controls will be recorded in the "Risk Matrix of each subsidiary" and in the corresponding procedures.

The specific due diligence control mechanism is deployed across four documented processes:

1. The control of processes and activities is carried out under the "Corporate Procedure for Compliance Risk Management."
2. Due diligence on the Corporation's Employees, clients, and suppliers is documented in the Corporate Due Diligence Standard for Clients, Suppliers, and Employees.
3. With respect to operations and transactions, the "GEN-GCAC-PRC-008 Corporate Procedure for Transactions, Activities, Operations, and Non-Financial Control" is followed.

The Corporation may conclude that it is unnecessary, unjustified, or disproportionate to carry out due diligence in certain categories of Employees and business partners (clients and suppliers). This decision will be documented in a report specifying the reasons, which must be signed by the General Manager of each subsidiary.

On a semiannual basis, the Corporate Ethics and Compliance Officer will report these cases to the Audit and Risk Committee of the Board of Directors of Ferreycorp S.A.A.

8.3. Financial Controls

The Corporation defines internal controls to prevent and manage the risk of the occurrence of Crimes, seeking to ensure that its actions are transparent and compliant with the law. To this end, it maintains an adequate internal accounting control system, recording its accounts and transactions transparently in the Financial Accounting Systems.

The Corporation and its subsidiaries establish rules and procedures for bank transfers, securities, cash movements, and the use of credit cards.

The Finance Departments of each subsidiary are required to report any irregularities detected in accounting records to the Corporate Audit Management.

The Corporate Audit Management will conduct the corresponding verifications or investigations to determine the origin of the irregularity and take the necessary corrective measures.

If the detected irregularity cannot be rectified, it shall be reported to the General Management of each subsidiary and to the Corporate Compliance Officer by means of a report, indicating the measures taken with respect to said transaction.

8.4. Non-Financial Controls

The Corporation implements non-financial controls to manage the risk of Crimes occurring in areas related, for example, to commercial and legal management, among others, which execute non-financial processes.

In this regard, mandatory compliance parameters have been established through the “GEN-GCAC-PRC-008 Corporate Procedure on Transactions, Activities, Operations and Non-Financial Control.”

Any particular operation, activity, or relationship may be subject to both financial and non-financial controls.

8.5. Implementation of Compliance Controls by Controlled Organizations and Business Partners

All subsidiaries of the Corporation (business partners controlled in accordance with ISO 37001:2016) shall implement the Compliance System within a maximum period of three (03) years from its effective date.

Regarding business partners not controlled by the Corporation (clients and suppliers), the Corporation and its subsidiaries will only initiate operations or activities with those who comply with the guidelines set out in the Corporate Standard on Due Diligence for Clients, Suppliers, and Employees.

8.6. Compliance Commitments

All non-controlled business partners with whom the Corporation or its

subsidiaries have a relationship must sign the following documents, as applicable:

- i) Anti-corruption clauses in contracts, sworn statements of acknowledgment, among others;
- ii) Anti-corruption clauses in the Terms and Conditions of Purchase Orders;
- iii) Supplier Sworn Declarations.

These documents require, to the extent possible, that:

- a) Non-controlled business partners commit to preventing Crimes by, on behalf of, or for the benefit of the business partner in relation to the corresponding operation, project, activity, or relationship;
- b) The Corporation may terminate the relationship with the business partner if it becomes aware of acts related to the commission of Crimes by, on behalf of, or for the benefit of the business partner in relation to the corresponding operation, project, activity, or relationship.

Thus, with the intention of prohibiting the commission of Crimes at all levels, clauses specifically aimed at requiring their prevention are included.

8.7. Gifts, Hospitality, Donations, and Similar Benefits

The Corporation has implemented the GEN-GCAC-NC-001 Corporate Standard on the Giving and/or Receiving of Gifts, Payments, Favors, and Others, aimed at preventing the offering, provision, or acceptance of gifts, hospitality, donations, and similar benefits, where these could be perceived as a bribe.

8.8. Management of Insufficient Compliance Controls

When due diligence carried out in a specific operation, project, activity, or relationship with a business partner cannot be addressed through the existing compliance controls, and the business partner is unable or unwilling to implement additional or enhanced compliance controls, or to take other appropriate measures (such as changing the nature of the operation, project, activity, or relationship), the Corporation must:

- a) In the case of an existing operation, project, activity, or relationship, adopt measures that may be considered appropriate given the risks of the Crimes involved and the nature of the operation, project, activity, or relationship, in order to terminate, discontinue, suspend, or withdraw from it as soon as possible.
- b) In the case of a new proposed operation, project, activity, or relationship, postpone or decline to proceed until the risk is mitigated.

8.9. Raising Concerns

The Corporation implements procedures to:

- a. Encourage and facilitate Employees to report and/or disclose in good faith, or on the basis of a reasonable belief, any attempt at the commission of Crimes, whether alleged or actual, or any non-compliance or weakness in the Compliance System (CS), to the Corporate Ethics and Compliance Officer.
- b. Ensure that reports are treated confidentially, in order to protect the identity of the whistleblower and of any other persons involved or referred to in the report, except where such confidentiality would hinder the progress of the investigation.
- c. Allow for anonymous reporting.
- d. Prohibit any form of retaliation against the whistleblower, and protect those who report from the existence of such retaliation, provided that they have raised or reported, in good faith or on the basis of a reasonable belief, the attempt or occurrence of Crimes, whether alleged or actual, or a violation of the Compliance Policy or the CS.
- e. Allow Employees to receive advice from an appropriate person or from the Corporate Ethics and Compliance Officer on what to do if they are faced with a problem or situation that may involve Crimes.

The Corporation ensures that all Employees are aware of the reporting and/or whistleblowing procedures, that they are able to use them, and that they understand their rights and protections under the scope of these procedures.

To achieve the objective of preventing the commission of Crimes, a communication channel, the “Whistleblowing Channel”, is made available to both Employees and third parties in general (stakeholders), so that, if necessary, they may report any circumstance that could represent the materialization of a risk of committing Crimes against the Corporation, as well as any non-compliance or weaknesses they detect in the CS, thereby contributing to its continuous improvement.

In addition, the provisions set forth in the “GEN-GCAC-PRC-010 Corporate Procedure for the Management of Whistleblowing Reports” must be followed.

8.10. Investigation and Handling of Irregularities

The Corporation implements procedures to:

- a. Require an assessment and, where appropriate, an investigation of any Crime, or violation of the Compliance Policy or the SC, where there are reasonable suspicions of its occurrence, or its existence is detected, using the appropriate channels for disclosure;
- b. Require appropriate measures in the event that the investigation reveals any Crime, or violation of the Compliance Policy or the SC;
- c. Empower and provide facilities to the investigators;
- d. Require the participation and cooperation of the Employees deemed necessary to be involved in the investigation;
- e. Require that the status and results of the investigation be

- reported to the Corporate Ethics and Compliance Officer;
- f. Require that the investigation be carried out confidentially and that the results not be disclosed, preserving its confidentiality.

For compliance with the above, the Corporation provides the necessary resources to carry out investigations, while ensuring at all times the rights of both the whistleblower and the reported party. This function is developed in the “GEN-GCAC-PRC-010 Corporate Procedure for the Management of Complaints”.

9. PERFORMANCE EVALUATION

9.1. Monitoring, Measurement, Analysis, and Evaluation

The Corporation applies appropriate methods for monitoring, measurement, analysis, and evaluation of the SC, in order to verify the capacity of the processes to achieve the planned results.

The Corporation’s SC is evaluated through indicators defined in the “SC Indicator List”, which specifies the responsible parties and monitoring frequency, as well as the documented information from these evaluations. These indicators assess compliance performance and the effectiveness and efficiency of the SC.

The Corporate Ethics and Compliance Officer reviews those indicators that do not achieve the desired results and implements corrective actions as necessary and appropriate.

The Compliance Report must be presented to the General Manager of each subsidiary and to the Board of Directors of Ferreycorp S.A.A. in the monitoring meetings, at planned intervals.

This function of the Corporate Ethics and Compliance Officer is fully developed in the “GEN-GCAC-PRC-004 Corporate Procedure for SC Monitoring and Measurement”.

9.2. Internal Audit

The Corporation periodically carries out internal audits to verify the proper functioning of the SC, ensuring compliance with:

- Applicable legislation related to the SC;
- The Corporation’s own SC requirements;
- The requirements of ISO 37001:2016.

The Corporation plans the annual audit program, taking into account the status and importance of the processes and areas to be audited, as well as the results of previous audits. The audit criteria, scope, frequency, and methodology are defined. This program is specified in the “GEN-GCAC-PRC-006 Corporate Procedure for SC Auditing”.

9.3. Management Review

9.3.1. Review by Senior Management

The General Manager of each subsidiary reviews the SC of each subsidiary of the Corporation at least once a year, to ensure its suitability, adequacy, and ongoing effectiveness. The review includes the assessment of improvement opportunities and the need to make changes to the SC, including the compliance policy and objectives.

The review carried out by the General Management of each subsidiary includes considerations regarding:

- The status of actions undertaken as a result of previous management reviews;
- Recommended changes to the SC risk matrix, when circumstances generate new risks not previously identified;
- Information on the performance of the SC;
- Trends related to Nonconformities and Corrective Actions;
- Monitoring and measurement results;
- Results of conducted audits;
- Investigations of Crimes;
- The nature and extent of Crime risks faced by the Corporation;
- The effectiveness of measures adopted to address Crime risks;
- Opportunities for continuous improvement of the SC.

The reviews carried out by the General Management of each subsidiary will be documented through meeting minutes, which will be under the custody and responsibility of the Corporate Ethics and Compliance Officer. A summary of the results of the review conducted by the General Management of each subsidiary is communicated to the Board of Directors of each subsidiary and to the Board of Directors of Ferreycorp S.A.A.

9.3.2. Review by the Governing Body

The Board of Directors of Ferreycorp S.A.A. is responsible for periodically reviewing the SC based on the information provided by the General Manager of each subsidiary and the Corporate Ethics and Compliance Officer, as well as any other information the Board may request or obtain.

The Corporate Ethics and Compliance Officer will keep a record of the reviews conducted by the governing body.

9.4. Review by the Compliance Function

The Corporate Ethics and Compliance Officer continuously evaluates the Corporation's Compliance System, with the purpose of determining whether it is:

- Adequate to effectively manage the Crime risks faced by the Corporation;
- Effectively implemented.

The Corporate Ethics and Compliance Officer reports, through the Audit and Risk Committee of Ferreycorp S.A.A., every six months, to the Governing Body (Board of Directors of Ferreycorp S.A.A.), with a copy to Senior Management (General Manager of each subsidiary), regarding the adequacy and implementation of the SC, including the results of investigations and audits.

10. IMPROVEMENT

10.1. Nonconformities and Corrective Actions

Aware that, despite all the controls established in the fight against Crimes, nonconformities may arise-i.e., failures and/or weaknesses-associated with the SC, the Corporation has developed the “GEN-GCAC-PRC-005 Corporate Procedure for the Management of Nonconformities and Corrective Actions”, which defines the actions to be taken in order to:

- a) React immediately to the failure and/or weakness, and, as applicable:
 - 1. Take actions to control and correct it,
 - 2. Address the consequences;
- b) Assess the need to take actions to eliminate the causes of the failure and/or weakness, in order to prevent recurrence or occurrence elsewhere, through:
 - 1. Reviewing the nonconformity,
 - 2. Determining the causes that originated the nonconformity, and
 - 3. Determining whether similar nonconformities exist or could occur;
- c) Review the effectiveness of any corrective action taken;
- d) If necessary, make changes to the SC.

Corrective actions must be appropriate to reverse the effects of the identified nonconformities.

10.2. Continuous Improvement

The Corporation seeks to implement continuous improvement processes in the ongoing pursuit of suitability, adequacy, and effectiveness, both of the “Corporate Compliance Policy” and of the rest of the SC.

To this end, the “GEN-GCAC-PRC-004 Corporate Procedure for Monitoring and Measuring the SC” and the “Corporate Procedure for the Management of Nonconformities and Corrective Actions of the SC” are applied, together with the corresponding system review records by Senior Management and by the Governing Body.

Annex 1: Environmental Analysis Matrix

The Environmental Analysis Matrices are recorded in the following documents:

SGC-01 Environmental Analysis Matrix – Ferreyros

SGC-02 Environmental Analysis Matrix – Ferreycorp

SGC-03 Environmental Analysis Matrix – Fargoline

SGC-04 Environmental Analysis Matrix – Soltrak

SGC-05 Environmental Analysis Matrix – Ferrenergy

SGC-06 Environmental Analysis Matrix – UNIMAQ

SGC-07 Environmental Analysis Matrix – Orvisa

SGC-10 Environmental Analysis Matrix – Forbis

SGC-11 Environmental Analysis Matrix – Vixora

These documents provide evidence of the version and date of preparation.

Annex 2: Stakeholder Matrix

The Stakeholder Matrices are recorded in the following documents:

SGPI-01 Stakeholder Matrix – Ferreyros

SGPI-02 Stakeholder Matrix – Ferreycorp

SGPI-03 Stakeholder Matrix – Fargoline

SGPI-04 Stakeholder Matrix – Soltrak

SGPI-05 Stakeholder Matrix – Ferrenergy

SGPI-06 Stakeholder Matrix – UNIMAQ

SGPI-07 Stakeholder Matrix – Orvisa

SGPI-10 Stakeholder Matrix – Forbis

SGPI-11 Stakeholder Matrix – Vixora

These documents provide evidence of the version and date of preparation.

Annex 3: Scope Determination

Ferreyyros:

Marketing, rental, and after-sales service of machinery and spare parts. With the following processes:

- Strategic Planning
- Marketing and Digital Business
- Commercial / Prime and Rentals
- Commercial / Operations (Services and Contracts)
- Commercial / Spare Parts and Logistics
- Accounting
- Finance / Management Control
- Finance / Credit and Collections
- Finance / Financial Services and Treasury
- Finance / UCMI-UIF
- Human Resources
- Procurement
- Legal – Ferreycorp
- Compliance – Ferreycorp
- Risk – Ferreycorp
- Audit – Ferreycorp
- IT, Processes, and Innovation – Ferreycorp

Ferreycorp:

Corporation specialized in the provision of capital goods and related services, providing support activities to its subsidiaries with the following processes:

- Strategic Planning
- Finance / Accounting
- Finance / Management Control
- Finance / Financial Services and Treasury
- Procurement
- Human Resources
- Legal
- Compliance
- Risk
- Audit
- IT, Processes, and Innovation
- Marketing

Fargoline:

Logistics Operator for its services of Temporary Warehouse, Customs Warehouse, Simple Storage, Transport, and Distribution. With the following processes:

- Strategic Planning / Management
- Strategic Planning / Integrated Management System (IMS)
- Marketing / Customer Service – Commercial
- Operations

- Human Resources
- Procurement
- Finance / Invoicing
- Finance / Accounting – Treasury
- Finance / Credit and Collections
- IT – Systems
- Asset Security
- Legal – Ferreycorp
- Compliance – Ferreycorp
- Risk – Ferreycorp
- Audit – Ferreycorp
- TPI – Ferreycorp

Soltrak:

Commercialization of industrial safety products, lubricants, tires, filters, specialized equipment, tools, and abrasives. Provision of marketing services for industrial safety products, lubricants, and tires. With the following processes:

- Strategic Planning
- Integrated Management System
- Commercial
- Services
- Logistics
- Dispatch
- Talent Management
- Dispatch
- Finance
- IT
- Marketing
- Administration
- Corporate Services Ferreycorp: Legal, Compliance, Risk, Internal Audit, and Technology Processes and Innovation.

Ferrenergy:

Provider of power generation solutions for projects and companies: temporary energy solutions or permanent solutions, based on reciprocating generator sets (natural gas, Diesel, and HFO), turbines, and solar panels. With the following processes:

- Strategic Planning
- Integrated Management System
- Commercial Process
- Asset Control Process
- Operation and Maintenance Process
- Administrative Process
- Customer Service Process
- Human Resources – Ferreycorp
- IT, Processes, and Innovation – Ferreycorp
- Finance – Ferreycorp
- Legal Advisory – Ferreycorp
- Risk Management – Ferreycorp
- Audit – Ferreycorp

Unimaq:

Commercialization, rental, and after-sales service of machinery and spare parts. With the following processes:

- Management
- Logistics
- Commercial
- Product Support
- Human Resources
- Finance
- IT, Processes, and Innovation – Ferreycorp
- Legal – Ferreycorp
- Compliance – Ferreycorp
- Audit – Ferreycorp

Vixora:

Provider of comprehensive technology solutions and after-sales services for productivity and safety, mainly for the mining and construction sectors. With the following processes:

- Strategic Planning
- Innovation
- Integrated Management System
- Commercial Management
- Logistics Management
- Support and Services Management
- Revenue Flow Management
- Human Talent Management
- Marketing
- Financial Management – Ferreycorp
- Legal Advisory – Ferreycorp
- Information Technology – Ferreycorp
- Compliance Management – Ferreycorp
- Audit Management – Ferreycorp
- Risk Management – Ferreycorp

Orvisa:

Commercialization, rental, and after-sales service of machinery and spare parts. With the following processes:

- Management
- Commercial / Prime
- Commercial / Services and Spare Parts
- Administration / Logistics
- Administration / Treasury
- Administration / Accounting
- Administration / Management Control
- Administration / Financial Services
- Human Resources
- Marketing
- Legal – Ferreycorp
- Compliance – Ferreycorp
- Risk – Ferreycorp
- Audit – Ferreycorp
- IT, Processes, and Innovation – Ferreycorp

Forbis:

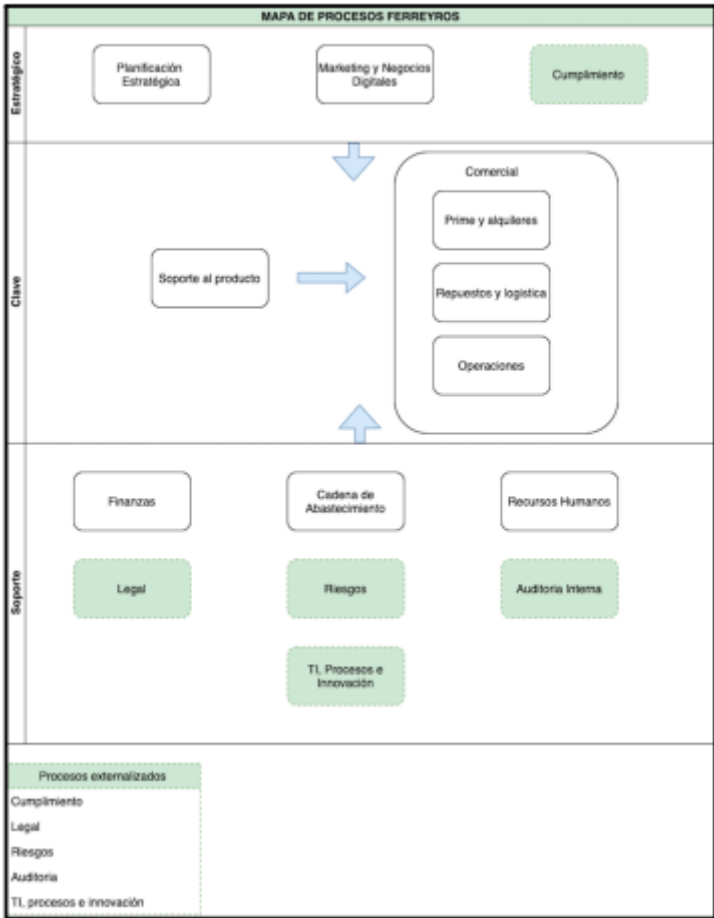
Freight forwarding services for air and maritime import and export.

With the following processes:

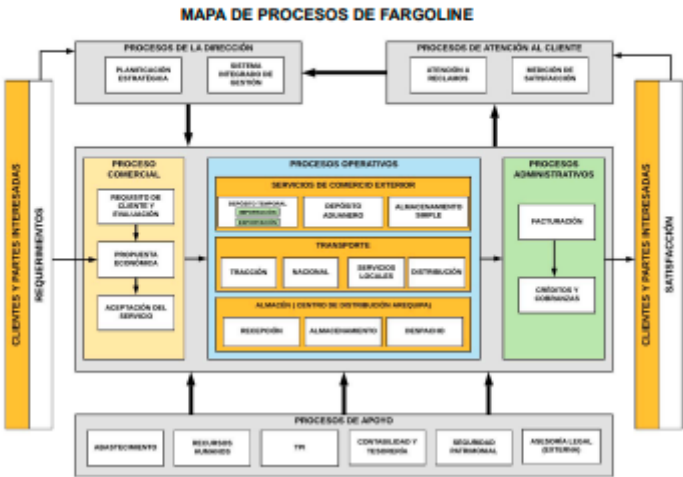
- Strategic Management
- Integrated Management System
- Commercial / International Trade (COMEX) Management
- Service Planning and Execution / Customs
- Service Planning and Execution / Transportation
- Service Planning and Execution / Freight
- Invoicing
- Finance / Accounting and Taxation
- Finance / Treasury
- Finance / Collections
- Human Resources
- Administration
- Suppliers / Pricing
- IT, Processes, and Innovation
- Legal – Ferreycorp
- Audit – Ferreycorp
- Risk – Ferreycorp
- Compliance – Ferreycorp
 - IT, Processes, and Innovation (TPI) – Ferreycorp

Anexo 4: Mapa de procesos por subsidiaria

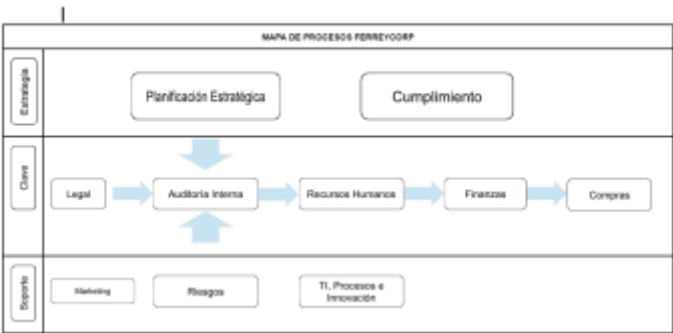
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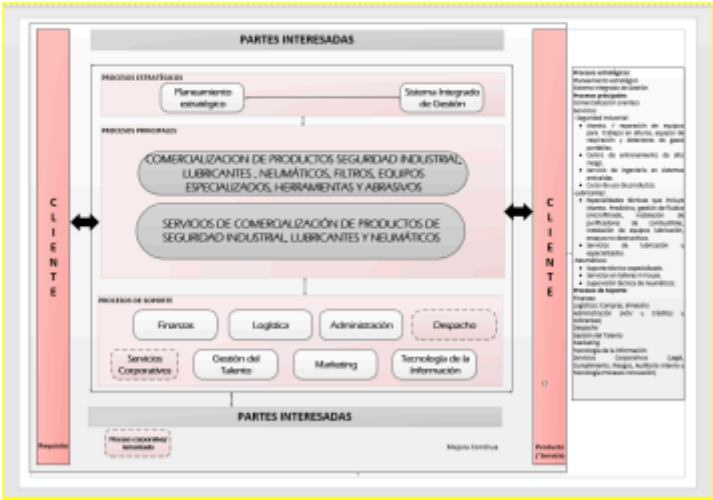
Fargoline:



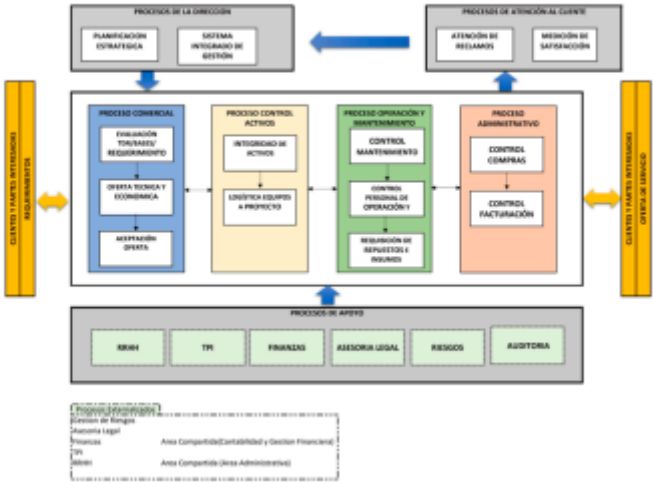
Ferreycorp



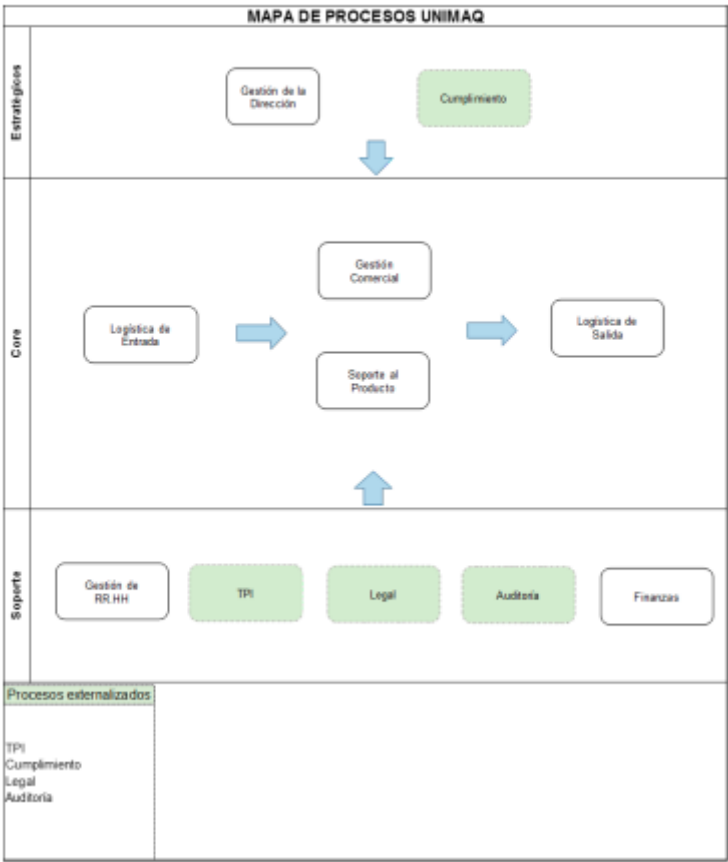
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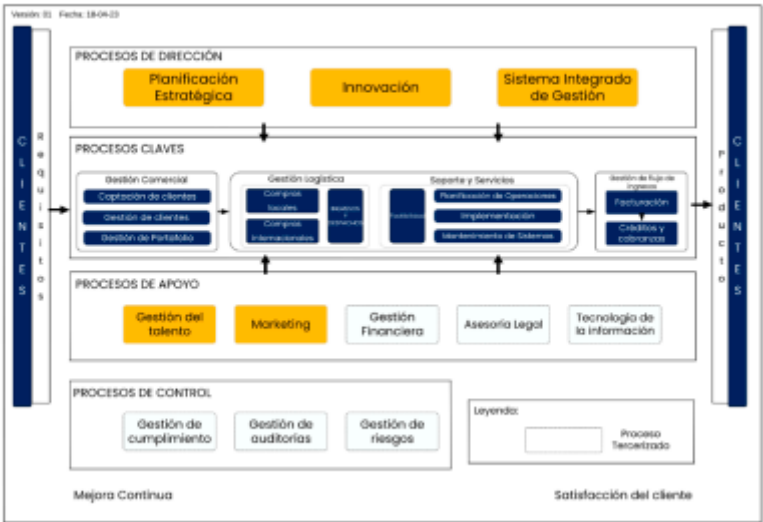
Ferrenergy



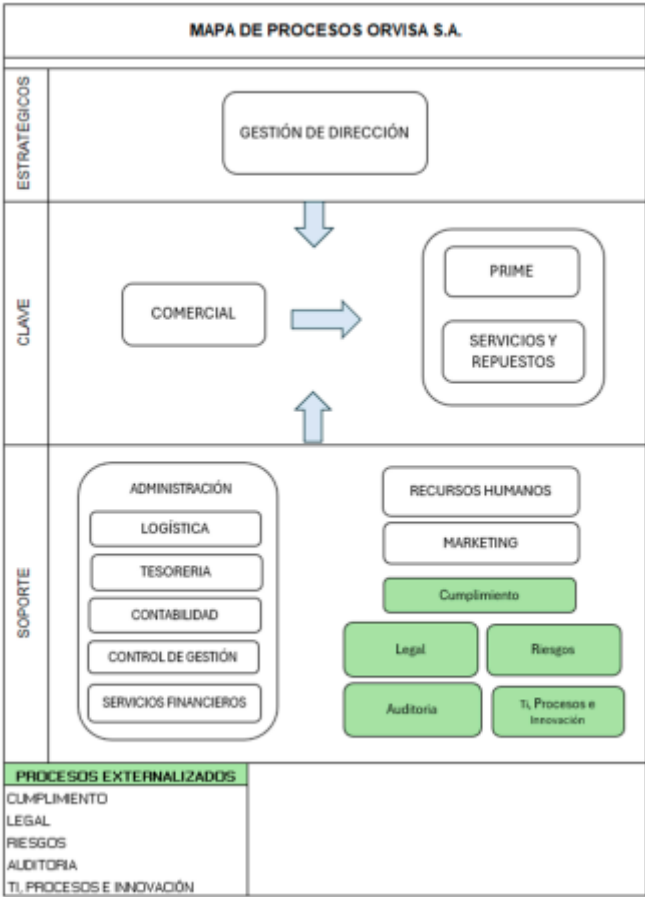
Unimaq:



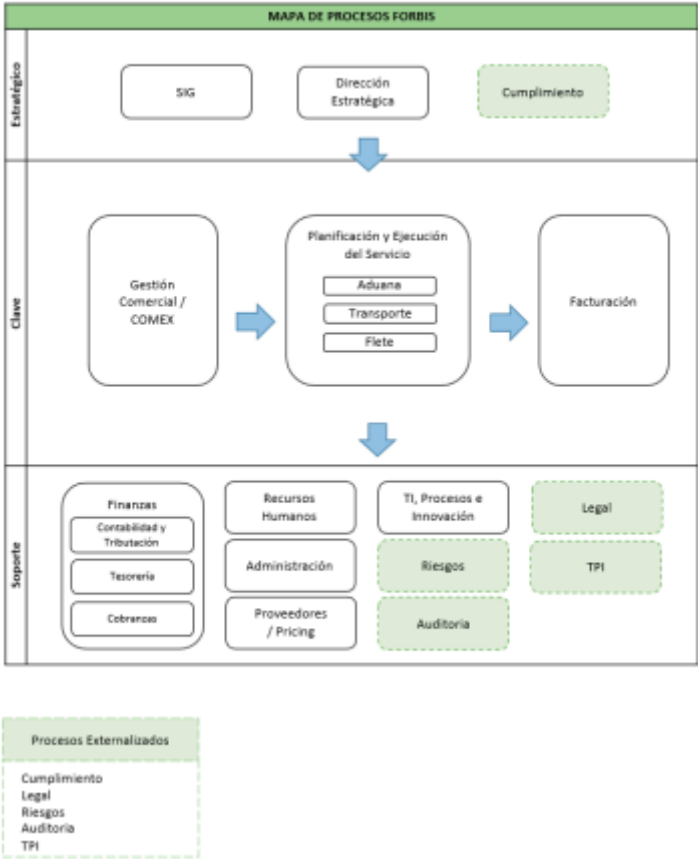
VIXORA



ORVISA



FORBIS



THIS DOCUMENT HAS BEEN AUTHORIZED IN THE STANDARD SYSTEM BY:

ROLE	NAME	POSITION	DATE
Elaborator	Eduardo Ramírez del Villar	CORPORATE AFFAIRS MANAGER	Approved - 01/09/2023 17:48
Reviewer	Eduardo Ramírez del Villar	CORPORATE AFFAIRS MANAGER	Approved - 01/09/2023 17:58
Approver	Mariela Garcia De Fabbri	GENERAL MANAGER	Approved - 12/09/2023 09:21

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Elaborator	Maria del Carmen Blume Cilloniz	DEPUTY MANAGER OF COMPLIANCE	Approved - 10/13/2024 10:30
Reviewer	Eduardo Ramírez Del Villar	CORPORATE MANAGER OF CORPORATE AFFAIRS	Approved - 10/13/2024 12:58
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