

	CORPORATE COMPLIANCE SYSTEM POLICY (SP)	CÓDE	VERSIÓN
		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.

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

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.

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.

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.

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.

## 6.1 APPENDIX 1: List of Compliance Obligations

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## Types of Obligations

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

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**THIS DOCUMENT HAS BEEN AUTHORIZED IN THE REGULATORY SYSTEM BY:**

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