

	SUPPLIER CODE OF CONDUCT	CODE	VERSION
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		EFFECTIVE START DATE	EFFECTIVE END DATE
		06.02.2021	06.02.2030
ELABORATING MANAGEMENT	CORPORATE FINANCE MANAGEMENT		
ELABORATED BY	REVISED BY	APPROVED BY	
María Antonieta Sertzen	Carolina Navarro Sánchez Salazar	Patricia Gastelumendi Lukis	
SUPPLIER EXECUTIVE	ASSISTANT MANAGER OF CORPORATE SERVICES AND ENVIRONMENT	FINANCE MANAGER	

1. INTRODUCTION

At Ferreycorp Corporation we promote an ethical culture based on values. The directors, managers, officers and collaborators of the corporation as a whole guide our individual behavior based on our four corporate values: Commitment, Integrity, Respect and Fairness, putting them into action in the performance of our work and in decision making. In this way we have built, and maintain over the years, a solid culture based on prestige and good reputation, achieved through our relationships with different 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 and suppliers.

Ferreycorp S.A.A. and all its subsidiary companies (hereinafter “Ferreycorp”) consider its suppliers as strategic partners for the achievement of its goals, always seeking to establish relationships with them based on trust and mutual benefit. The purpose of this Supplier Code of Conduct (hereinafter, the “Code”) is to establish the guidelines that suppliers must maintain for the proper development of their activity, maintaining their ethical commitment with social and environmental responsibility.

2. SUSTAINABILITY

2.1. Laws and regulations

Suppliers shall conduct their activities in accordance with the regulations in force within the scope of their business activity, as well as in accordance with the Corporate Code of Ethics of Ferreycorp, which is published at the following link: <https://www.ferreycorp.com.pe/assets/uploads/archivos/compartidos/14194670ea97b936c049d060b7ebcf03.pdf>

We deal with suppliers that act with integrity, respect the laws and regulations in force, promote good business practices and fair competition and firmly reject any form of fraudulent, corrupt or illegal conduct.

2.2. Products and Services

Suppliers shall provide high quality products and services in accordance with negotiated requirements and technical specifications.

Suppliers shall not receive remuneration that transcends the commercial relationship; they shall obtain the preference of the corporation based on the quality and proposed conditions of the products or services they offer.

2.3. Traceability

Suppliers shall develop the necessary procedures to provide Ferreycorp with evidence of the origin of the product and/or service and the production quality standard upon request.

2.4. Personal Data, Confidentiality and Intellectual Property

2.4.1. Suppliers shall protect the confidential information granted by Ferreycorp according to the agreements entered into with the organization, and shall not disclose or independently use such information, intentionally or unintentionally.

2.4.2. Suppliers shall comply with all applicable laws in force related to personal data and intellectual property. This includes respecting trademarks and patents and not engaging in counterfeiting.

2.5. Conflict of Interest

Suppliers shall avoid any situation that presents itself as a conflict of interest by always acting with loyalty, integrity, independence and guided by the principles of good faith.

2.6 Human rights and labor

2.6. 1 Employment contracts, pay and benefits

2.6.1.1 Suppliers shall ensure that each employment contract with their workers is recognized by labor and other applicable laws. Likewise, they shall ensure the payment of wages and all labor rights and benefits of their workers in a complete, regular and direct manner. Suppliers shall keep records of such payments as required by applicable regulations.

2.6.1.2 Suppliers shall comply with laws on regular working hours and overtime, as well as all other labor rights and benefits applicable to their workers.

2.7. Child labor

Suppliers shall not use, support or promote child labor, and shall avoid exposing them to exploitative situations, whether inside or outside our facilities.

2.8. Forced labor

Suppliers shall not use, support or promote any form of forced or compulsory labor.

2.9 Discrimination

Suppliers shall ensure equality of opportunity and treatment with all their stakeholders, without discrimination on the basis of race, disability, political opinion, political opinion, union membership, gender, gender identity, ethnicity, nationality, religion, age, sexual orientation, social class and other grounds recognized in the laws of the country.

2.10 Freedom of association and collective bargaining

Suppliers shall respect the right of their workers to join or form unions, institutions and guilds and to engage in any collective bargaining in accordance with legal procedures in the applicable jurisdiction. Suppliers shall not discriminate against representatives of workers and shall allow them to carry out their representative functions in the workplace.

2.11 Occupational Health and Safety

2.11.1 Suppliers shall provide a safe and secure working environment for their workers. Suppliers shall implement procedures to minimize risks to their workers and prevent accidents and injuries. Safety shall take priority over any action or threat that disrupts the smooth running of the work or puts workers and visitors at risk and danger.

2.11.2 The suppliers of Ferreyrcorp shall comply with requiring their workers to work schedules in accordance with the law, and shall pay remuneration, benefits, overtime, rest periods, in a timely manner and in accordance with the work

performed, as well as provide good working conditions such as clean, ventilated and safe environments, access to clean bathrooms, washing facilities, drinking water and adequate facilities for food storage. On the other hand, respectful relationships and rules that favor a work-life balance.

2.12 Environmental management

Suppliers shall conduct responsible environmental management ensuring compliance with the following guidelines:

- **Reduce the carbon footprint** both in their own operations and throughout their value chain and life cycle of their products, in addition to implementing actions to reduce their energy consumption through more efficient use, reduction of energy losses, technological modernization and preference for the use of energy from renewable sources such as hydroelectric, wind, solar, geothermal, etc.
- **Prevent all types of environmental pollution or contamination** resulting from its operations and / or activities through the management and elimination of by-products in its operations, such as air pollutants, wastewater and solid waste (including hazardous and non-hazardous waste), ensuring compliance with applicable environmental legal requirements.
- Improve the **eco-efficiency in its operations** by efficiently managing water, energy, materials, effluents and waste, as well as implementing technological improvements in product / process design that enable more efficient use of raw materials or water.
- Promote the **protection of the biodiversity** and prevent deforestation and damage to biomass that negatively affect ecosystems through good practices such as offsetting emissions in projects that protect biodiversity, prevent the acquisition of materials that come from illegal activities in protected natural areas. Likewise, contribute to the conservation of natural resources through good practices that allow extending the permanence of materials and products in use in productive systems.
- Offer products and services that contribute to a better planet: from the design, selection of materials and packaging, the environmental impact must be considered throughout the life cycle of its products. Likewise, the services provided on site must comply with the environmental requirements established by each Ferreycorp subsidiary company.
- Train its personnel regarding these commitments as well as promote the implementation of these good practices throughout its value chain, involving its customers and suppliers to establish synergies including the transportation and logistics stages.

2.13 Responsible and sustainable sourcing

Suppliers shall exercise due diligence in the selection of their own suppliers and subcontractors to ensure responsible and sustainable sourcing throughout the supply chain. In particular, suppliers shall not source raw materials or components from organizations or individuals linked to illegal activities, human rights violations or others.

2.14 Transparency of the information

- 2.14.1 Suppliers shall work their financial information in a clear and verifiable manner in accordance with accounting principles appropriate to the size, nature and form of their business. They shall ensure transparency of information.
- 2.14.2 All business transactions shall be conducted in a transparent manner and accurately recorded in the books and records of the supplier. Suppliers shall establish adequate information security controls to secure the information provided by Ferreycorp.
- 2.14.3 Suppliers shall state the characteristics of their products in a truthful manner and without misleading messages.

2.15 Combating bribery and corruption

- 2.15.1 Ferreycorp is committed to fighting corruption by establishing principles and a compliance system for the prevention of corruption to guide the behavior of all its employees, directors, partners, consultants, customers and suppliers of goods and / or services in general, who have a relationship with the Corporation.
- 2.15.2 Suppliers must have the highest standards of moral and ethical conduct, respect applicable laws, and not engage in any form of corrupt practices, such as bribery, kickbacks, collusion, corruption in the private sector and within private entities, extortion, fraud, influence peddling, money laundering, and financing of terrorism, among others.
- 2.15.3 Suppliers shall comply with the legislation applicable to their activity, as well as with the policies, standards and procedures established in the Anti-Corruption Corporate Compliance System of Ferreycorp and its subsidiaries, which contains the Corporate Compliance Policy, the Corporate Code of Ethics, as well as the applicable internal and external regulations related to the anti-corruption program. Likewise, the supplier shall comply with the rule on Administrative Liability of Legal Entities, approved by Law No. 30424, with the amendments incorporated by Legislative Decree No. 1352 and Law No. 30835, and the rules on Prevention of Money Laundering and Financing of Terrorism, approved by Law No. 27693, and its regulations,

approved by Supreme Decree No. 018-2006-JUS, as well as SBS Resolution 789-2018. The policies and rules of the Compliance System of Ferreycorp can be found at the following

Link : [https://www.ferreycorp.com.pe/es/gobierno-corporativo/sistema-de-cumplimiento o.](https://www.ferreycorp.com.pe/es/gobierno-corporativo/sistema-de-cumplimiento)

- 2.15.4 Suppliers shall not deal dishonestly either with our employees or with their own customers and suppliers, whether in the private or public sector. 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 retribution that transcends the commercial relationship. Therefore, our employees should not expect any type of retribution from the customers or suppliers of the Corporation, so they will not accept gifts, favors, invitations, commissions, fees, money or income of any kind that transcend the rules of courtesy and commercial standards.

2.16 Harassment

Suppliers shall prohibit physical or verbal abuse and all other forms of intimidation or harassment in the workplace.

3. STRATEGIES FOR ETHICAL SUPPLIER ACTION

3.1. Supplier Code of Conduct Management

- 3.1.1. Suppliers shall establish, implement and maintain appropriate management systems, policies, due diligence processes, procedures, communications and control systems to ensure that their business operations and supply chains are aligned with the principles set forth in this Code. In addition, they shall actively review, monitor and modify their management processes in order to remain aligned, and encourage all those who interact with them to make the same commitment.
- 3.1.2. Suppliers shall demonstrate compliance with this Code. In order to verify their progress in the implementation of this Code, Ferreycorp may perform the following actions, such as, for example:
- a. Verify payment documents to its workers, corresponding to remuneration and other benefits and labor rights such as, for example: payroll, insurance, AFP, CTS, among other documents.
 - b. Conduct audits, on-site evaluations and inspections of the facilities of the supplier and those of its subcontractors to ensure compliance with the obligations set forth in this Code. Suppliers shall cooperate in all aspects.
- 3.1.3. Suppliers shall submit improvement and corrective action plans when deficiencies are found in their processes in relation to compliance with

this Code.

3.2. Communication and Training

Suppliers shall communicate the content of this Code to their stakeholders to enhance ethical and sustainable sourcing processes throughout the supply chain. Suppliers shall provide training to their employees, subcontractors and their own suppliers on specific parts of this Code, as appropriate.

3.3. Supplier contract termination

Suppliers who fail to comply with the Code, or who fail to comply with a corrective action plan, will be at risk of termination of their contract or business agreement with Ferreycorp in accordance with its terms.

4. Complaints Channel

Should incidents arise due to non-compliance with the guidelines of this policy, all stakeholders of the corporation may make their complaints by making use of the channels established in GEN-GCAC-PRC- *Corporate Procedure for handling queries and complaints management* of the Corporate Compliance System, namely:

- Website: https://www.ferreycorp.com.pe/canal_denuncias/
- E-mail: canalddenuncias@ferreycorp.com.pe
- Telephone: 626 - 4110.
- Physical mailbox: Jr. Cristóbal de Peralta Norte 820, Santiago de Surco
- Personal interview with the Corporate Ethics and Compliance Officer.

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

THIS DOCUMENT HAS BEEN AUTHORIZED IN THE REGULATORY SYSTEM BY:

ROLE	NAME	POSITION	DATE
Elaborator	Maria Sertzen Baca	Supplier Executive	Approved - 07/25/2025

			11:30
Reviewer	Carolina Navarro Sanchez Salazar	Assistant Manager, Corp. and MA Services	Approved - 07/25/2025 12:25
Approver	Patricia Gastelumendi Lukis	Corporate Finance Manager	Approved - 07/31/2025 13:04