

CORPORATE HUMAN RIGHTS POLICY			 FCO-GCAC-CUU-POL-002	
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CORPORATE HUMAN RIGHTS POLICY

ISSUED BY:

**CORPORATE FINANCE MANAGEMENT AND CORPORATE MANAGEMENT OF
CORPORATE AFFAIRS - FERREYCORP S.A.A.**

THIS DOCUMENT HAS BEEN APPROVED BY:

Prepared by:	Reviewed by:	Approved by:
Maria Del Carmen Blume Compliance Sub-Manager Barbara Pita Dueñas Labor Relations and OSH Manager	Patricia Gastelumendi Lukis Corporate Finance Manager	Mariela García de Fabbri Chief Executive Officer of Ferreycorp

1. Objective

The purpose of this policy is to establish the guidelines to be followed by Ferreycorp S.A.A. and its subsidiaries (hereinafter "the Corporation") to guarantee respect for and the protection of human rights. The objective is to identify, prevent, mitigate, and monitor in a transparent manner actual or potential human rights risks across all its operations, projects, labor relations, supply chain, and relationships with communities and other stakeholders.

2. Scope

This policy establishes commitments regarding the respect and protection of the human rights of individuals associated with its stakeholders, and its compliance is mandatory for all employees, managers, and directors of the Corporation.

The Corporation extends compliance with the principles of this policy to its value chain, including suppliers, contractors, clients, business partners, and other related third parties, in accordance with the nature of the relationship and the level of identified risk.

The compliance standard established by this policy shall be considered, for corporate purposes, as the minimum regulatory requirement for all subsidiary companies of the Corporation and as corporate regulations, unless the laws of countries other than Peru where its subsidiaries operate regulate it more stringently, in which case the regulations of that country must be complied with.

3. Declaration of Respect for Human Rights

The Corporation considers human dignity to be a pillar of its corporate culture. Therefore, it declares its commitment to respecting and complying with applicable national and international human rights laws in all jurisdictions where it operates.

This Policy is interpreted and applied in accordance with the Political Constitution of Peru, current Peruvian legislation, and international treaties ratified by Peru. Likewise, it takes as a reference the United Nations Guiding Principles on Business and Human Rights and other international standards applicable to the Company's activities.

In this regard, the Corporation explicitly recognizes, respects, and guarantees the fundamental human rights of all individuals with whom it interacts in the development of its operations and activities. Its primary regulatory framework is grounded in best practices, in strict accordance with the following standards:

- The Universal Declaration of Human Rights.
- The United Nations Global Compact (signatories since 2004).
- The International Covenant on Civil and Political Rights; the International Covenant on Economic, Social and Cultural Rights; and the United Nations (UN) Guiding Principles on Business and Human Rights.
- Fundamental ILO Conventions, with special emphasis on: Freedom of Association (C087 and C098), Eradication of Forced and Child Labor (C029, C105, C138, C182), Equal Remuneration and Non-Discrimination (C100 and C111), Occupational Safety and Health (C155), and Elimination of Violence and Harassment (C190).
- The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

- The Sustainable Development Goals of the UN 2030 Agenda.
- Peru's National Action Plan on Business and Human Rights (NAP 2021-2025), approved by Supreme Decree No. 009-2021-JUS
- Equality and Non-Discrimination: Law No. 28983 (Equal Opportunities between Women and Men), Law No. 30709 (Prohibition of Wage Discrimination), and Law No. 29973 (General Law on Persons with Disabilities).
- Work Environment and Integrity: Law No. 27942 (Prevention and Punishment of Sexual Harassment).
- Health and Safety: Law No. 29783 (Occupational Safety and Health Law).
- Data Protection: Law No. 29733 (Personal Data Protection Law).
- Community and Environmental Setting: Law No. 28611 (General Environmental Law) and Law No. 29785 (Law on the Right to Prior Consultation for Indigenous or Native Peoples).

By virtue of this, the Corporation primarily guarantees the following fundamental rights: the right to life, integrity, and personal security; equal opportunity and non-discrimination based on race or ethnicity, age, sex, sexual orientation, gender identity and expression, disability, beliefs, religion, nationality or geographic origin, level of education, culture, opinion, political or union affiliation, socioeconomic status, and others; freedom of association and the right to collective bargaining; the right to a safe, dignified, and healthy working environment; the right to fair remuneration; and the absolute eradication of forced labor and child labor, among others.

Its steadfast commitment is to comply with these provisions as a minimum standard of action, integrating them horizontally across its governance and due diligence processes to prevent, mitigate, and remedy any negative impact in its operations and value chain.

Likewise, the Corporation recognizes that there are stakeholders or populations that may be in a situation of greater vulnerability to potential human rights impacts. Therefore, the Corporation pays special attention to, respects, and guarantees the protection of the rights of our employees and third-party personnel, women, children (with zero tolerance for child labor), persons with disabilities, the LGBTIQ+ community, elderly individuals, indigenous and Afro-descendant peoples, migrant workers, local communities, and human rights defenders. Our due diligence and risk assessment processes prioritize the identification, prevention, and mitigation of any adverse impact that could specifically affect these groups.

4. Corporate Commitments to Human Rights

To fulfill its declaration, the Corporation assumes explicit commitments across the following dimensions:

A. Decent Work Environment, Talent Attraction, and Labor Rights

- Working conditions, living wage, and well-being: Guarantees working hours that respect legal limits, adequate rest periods, paid vacation, and access to a living wage that ensures dignified conditions for the employee, as well as other labor rights in accordance with current regulations in each country.
- Talent attraction, training, and career path: Bases its employment strategy on meritocracy, equal opportunity, and attracting the best talent free from unconscious bias. It commits to providing continuous opportunities for training, technical development, and professional growth, maximizing the human potential of its workers in a safe and motivating environment.

- Eradication of modern slavery and child labor: Maintains zero tolerance toward any form of human exploitation, including forced labor, compulsory labor, human trafficking, or smuggling of human beings. Absolutely prohibits child labor within the Corporation and requires the same standard from suppliers and contractors, reserving employment exclusively for individuals over 18 years of age or whatever local legislation considers as the legal minimum age.
- Freedom of association, unionization, and right to strike: The Corporation respects freedom of association, meaning the right of its employees to form unions or federations of their choice, to join or leave them freely, and to exercise the right to strike, ensuring an environment free from retaliation or anti-union conduct.
- Collective bargaining: Promotes fair and transparent labor practices aimed at good-faith dialogue with representative organizations to establish terms and conditions of employment.

B. Diversity, Inclusion, Equity, and Respect for Integrity

- Prohibition of discrimination: The Corporation will promote a work environment based on equal opportunity, dignified treatment, and non-discrimination. Discrimination will not be tolerated on the grounds of race or ethnicity, age, sex, sexual orientation, gender identity and expression, disability, beliefs, religion, nationality or geographic origin, education level, culture, opinion, political or union affiliation, socioeconomic status, or any other condition protected by law.
- Gender pay equity: Commits to guaranteeing equitable, fully transparent remuneration regardless of gender for work of equal value, prohibiting unjustified wage gaps.
- Environment free from harassment, violence, and bullying: Strongly rejects all forms of violence, verbal, psychological, or physical abuse, abuse of authority, or workplace harassment.
- Prevention of workplace sexual harassment: Has specific, joint (bipartite), and independent intervention committees, as well as rigorous investigation and sanction procedures to eradicate workplace sexual harassment, safeguarding the integrity and dignity of victims at all times.

C. Occupational Health and Safety:

- Safe and healthy working conditions: Recognizes occupational health and safety as a fundamental human right. Therefore, it commits to providing and guaranteeing a safe, dignified, and healthy work environment, identifying and managing occupational risks, consulting with workers, and promoting their participation in the prevention of accidents, diseases, and work-related incidents, backed by corporate policies and related regulations.
- Occupational risk prevention: Promotes a culture of prevention, continuous improvement, and "zero accidents," always ensuring strict compliance with applicable legal regulations. We proactively prevent accidents and occupational diseases through the continuous identification, evaluation, and control of risks inherent to our operations, supported by joint (bipartite) and independent health and safety committees.

D. Responsible management of the supply chain and clients

- Supplier approval and responsible management: Periodically reviews and evaluates its contractors and suppliers, ensuring that their operating practices

respect human rights, socio-labor regulations, occupational health and safety, and environmental protection. It seeks to develop suppliers by promoting economic development in their areas of influence. To this end, it incorporates contractual requirements for ethical and human rights compliance, risk assessments, formal statements, audits, training, and improvement plans for suppliers and contractors, in a manner proportional to the risk and the Company's level of influence.

- **Customer rights, quality, and transparency:** Directs its management toward the comprehensive satisfaction of its clients by guaranteeing products and services with the highest quality and safety standards. It ensures transparent communication, ethical marketing, efficient service channels for handling complaints, and strict respect for consumer rights.
- **Data privacy and emerging technologies:** Safeguards the confidentiality, privacy, and security of the personal information of its employees, clients, and suppliers. The adoption of cutting-edge technologies, automation, and artificial intelligence is guided by strict ethical, cybersecurity, and algorithmic non-discrimination criteria.

E. Environment and Eco-Efficiency

- The corporation recognizes that access to a healthy, clean, and sustainable planet, as well as to safe drinking water and sanitation, are fundamental and inalienable human rights. The corporation commits to complying with environmental regulations, reducing its carbon footprint through eco-efficient operations, and optimizing the use of resources, materials, and energy.

Likewise, it promotes the preservation of biodiversity, fosters a circular economy through the reuse and recycling of industrial assets, and optimizes water management under a comprehensive approach that guarantees no negative impact on either the qualitative or quantitative availability of water sources for local communities. Finally, it seeks to reduce negative environmental impacts throughout its entire value chain—including distribution and logistics processes—encouraging clients and suppliers to create synergies to reduce their shared environmental footprint.

5. Human rights due diligence

In accordance with the highest standards, the Corporation has a human rights due diligence process based on risk management and a prevention model, which is carried out as follows:

- **Risk mapping and assessment:** Identification and periodic updating of the "Corporate Human Rights Risk Matrix" focused on the business lifecycle. This matrix must be updated every two (02) years on a mandatory basis, or immediately upon new large-scale investment projects, mergers, or acquisitions.
- **Integration, preventive mitigation, and remediation:** The Corporation applies operational controls and specific action plans to stop, prevent, mitigate, or correct potential impacts. If the Corporation has caused or contributed to a negative impact, it commits to actively participating in its legitimate and fair remediation.
- **Monitoring, follow-up, and transparent reporting:** The Corporation monitors the effectiveness of the measures adopted through an assessment conducted every two (02) years on the suitability of

established controls, as well as public accountability through auditable performance indicators, fully and transparently reflected in its integrated sustainability reports (Sustainability Report, Annual Report, GRI, Dow Jones Sustainability Index, among others).

- **Dissemination and training:** This policy will be available on the Corporation's intranet and website so that all stakeholders with whom it interacts are aware of the commitments assumed regarding human rights. The Corporation undertakes actions to raise awareness among its employees and suppliers to promote respect for human rights, as it deems appropriate.

6. Reporting Channel

The Corporation provides an accessible and confidential Reporting Channel to receive inquiries and reports regarding potential human rights violations. The Channel allows for anonymous submissions.

In this regard, should actions or omissions occur that are contrary to or put at risk the human rights outlined in this policy, employees, suppliers, clients, or third parties related to the Corporation may submit their reports through the Reporting Channel using the following access points:

- Ferreycorp Website: Link "[Reporting Channel](#)"
- Email address: canaldedenuncias@ferreycorp.com.pe
- Phone: +511 626-4110 or +51 981-970-638
- Physical Mailbox: Jr. Cristóbal de Peralta Norte 820, Santiago de Surco, Lima.
- In-person Interview: With the Corporate Ethics and Compliance Officer.

These reports will follow the same review and investigation procedure established by regulation GEN-GCAC-PRC-010 (Corporate procedure for handling inquiries and managing reports of the Corporate Compliance System) or its equivalent, guaranteeing full confidentiality, non-retaliation, and due process:

- Communications will be recorded, evaluated, and addressed within reasonable timeframes.
- Investigations are conducted with impartiality, confidentiality, and respect for due process.
- The Corporation will adopt corrective and preventive measures when a violation is confirmed or a significant risk exists.
- Retaliation against whistleblowers, witnesses, worker representatives, or individuals who cooperate in good faith with an investigation will not be tolerated.

7. Compliance with the Policy

Strict compliance with this policy is mandatory for all employees, managers, executives, and directors of the Corporation. In the case of employees, any violation of this policy will result in the application of appropriate disciplinary measures (warning, suspension, or dismissal) according to the severity of the offense, as stipulated in the Internal Work Regulations.

In the case of suppliers, contractors, and business partners, any proven transgression or non-compliance with this policy will be considered a material breach of their obligations. This will entitle the Corporation to unilaterally terminate the contractual relationship immediately as agreed upon, without generating any penalty, compensation, or liability for Ferreycorp, while reserving the right to initiate the corresponding legal actions.

Responsibility for the supervision and inquiries regarding this policy rests with the departments related to each stakeholder group with which they interact:

- Employees: Corporate Human Resources Management and/or the Corporate Ethics and Compliance Officer.
- Suppliers: Corporate Finance Management and/or the Corporate Ethics and Compliance Officer.
- Clients: Commercial and/or Marketing Managements and/or the Corporate Ethics and Compliance Officer.

8. Internal Regulatory Framework and Related Documents

This Policy is the primary Corporate guide on Human Rights. To translate these commitments into daily practice, it is complemented by the following internal regulations:

- Corporate Code of Ethics.
- Corporate Diversity, Equity, and Inclusion Policy.
- General Rule Internal Work Regulations of Ferreycorp and its Subsidiaries.
- Corporate Rule for the Prevention and Punishment of Sexual Harassment.
- Corporate Rule on Labor Relations, Labor Rights, and Legal Support.
- Corporate Salary Policy.
- Corporate Rule for the Management of Labor Intermediation and Outsourcing.
- Corporate Recruitment, Selection, Hiring, and Induction Rule.
- Annual Health, Safety, and Environmental Plan.
- Corporate Procedure for the Identification and Assessment of Legal and Other Health, Safety, and Environmental Requirements.
- Corporate Rule Internal Health, Safety, and Environmental Regulations.
- Integrated Corporate Health, Safety, and Environmental Policy.
- Risk Prevention Policies in OSH/HSE: Work Stoppage for Unsafe Conditions, Fatigue and Drowsiness, Alcohol and Drugs.
- Corporate Procedure for Hazard Identification, Risk Assessment, and Control Determination.
- Supplier Code of Conduct.
- Non-Commercial Purchasing Procedure Manual.
- Corporate Rule for the Management of Contractors and Third Parties.
- Corporate Rule for Non-Commercial Supplier Development.
- ESG Support Program for Suppliers.
- Code of Conduct for the Processing of Personal Data of Ferreycorp S.A.A. and its Subsidiaries.
- Corporate Rule for Customer Experience Management.
- Corporate Environmental Policy.
- Corporate Sustainability Rule.
- Rule for the New Business Process.
- Corporate Risk Management Manual.

- Corporate Risk Management Policy.

Version and change control

VERSION	DATE	REGISTERED BY	CHANGE
# 2	04/08/2026	Maria del Carmen Blume	Update of the declaration and the commitments assumed.

THIS DOCUMENT HAS BEEN AUTHORIZED IN THE NORMATIVE SYSTEM BY:

ROLE	NAME	POSITION	DATE
Developer	Maria del Carmen Blume Cilloniz	Compliance Sub-Manager	Approved - 17/09/2026 15:13
Reviewer	Patricia Gastelumendi Lukis	Corporate Finance Manager	Approved - 17/09/2026 15:43
Approver	Mariela Garcia De Fabbri	General Manager	Approved - 17/09/2026 16:48