

	SUPPLIER CODE OF CONDUCT	CÓDE	VERSIÓN
		FIN-ADMIN-PC-001	02
		INITIAL EFFECTIVE DATE	FINAL EFFECTIVE DATE
		06.02.2021	06.02.2025
PROCESSING MANAGEMENT	CORPORATE FINANCE MANAGEMENT		
ELABORATED BY	REVIEWED BY	APPROVED BY	
María Antonieta Sertzen	Carolina Navarro Sanchez Salazar	Patricia Gastelumendi Lukis	
NON-COMMERCIAL PROCUREMENT MANAGER	ASSISTANT MANAGER OF INFRASTRUCTURE AND CORPORATE SERVICES	CORPORATE FINANCE MANAGER	

1. INTRODUCTION

In the corporation (Ferreycorp S.A.A. and its subsidiaries) 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 seven corporate values: Integrity, equity, service vocation, excellence and innovation, respect for the individual, teamwork and commitment, 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 the 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, suppliers and other stakeholders.

Ferreycorp S.A.A. and all its subsidiaries (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 and 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 Ferreycorp's Corporate Code of Ethics, which is published at the following link:

https://www.ferreycorp.com.pe/assets/uploads/archivos/compartidos/14194670ea97b936c04_9d060b7ebcf03.pdf

We work with suppliers that comply with laws and regulations, promote good practices and fair competition, and reject fraudulent and illegal conduct.

2.2. Products and services

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

Suppliers may not receive retributions that transcend the commercial relationship; they will obtain the corporation's preference based on the quality and proposed conditions of the products or services that 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 provided 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 relating to personal data and intellectual property. This includes respecting trademarks and patents, and not engaging in counterfeiting.

2.5. Conflict de interest

Los proveedores deberán evitar cualquier situación que se presente como un conflicto de interés, actuando siempre con lealtad, integridad, independencia y guiados por los principios de la buena fe.

2.6. Employment contracts, remuneration and benefits

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

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

2.7. Child labor

Suppliers shall not use, support or promote the work of minors, avoiding 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.

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

2.9. Discrimination

Suppliers shall ensure equality of opportunity and treatment with all their stakeholders, without discrimination on the basis of race, disability, political opinions, 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 participate in any collective bargaining in accordance with legal procedures in the applicable jurisdiction. Suppliers shall not discriminate against workers' representatives 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 their workers with a safe and secure work environment. Suppliers shall implement procedures to minimize risks to their workers and prevent accidents and injuries. Safety shall take precedence over any action or threat that disrupts the proper functioning of the work or puts workers and visitors at risk and danger.
- 2.11.2. Suppliers shall provide employees with access to clean toilets, washing facilities, potable water and adequate food storage facilities.

2.12. Environmental Management

Suppliers shall carry out responsible environmental management, preventing any type of pollution or environmental impact and considering the following guidelines:

- Eco-efficiency in its operations: efficient management of water, energy, materials, effluents and waste within its facilities, as well as compliance with applicable environmental legal requirements.
- 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.
- Reduce the environmental footprint in its value chain: through responsible purchasing, promoting synergies among its suppliers and customers to reduce the carbon footprint and water footprint, including the transportation and logistics stages.
- To have environmentally and biodiversity friendly processes, taking care of the land and avoiding deforestation and depredation of forests.

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 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 supplier's books and records. Suppliers shall establish adequate the information security controls to secure the information provided by Ferreycorp.
- 2.14.3. Suppliers shall state the characteristics of their products in accordance with reality and without including misleading messages.

2.15. Fight against 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, clients and suppliers of goods and/or services in general, who have a relationship with the Corporation.
- 2.15.2. Suppliers shall have the highest standards of moral and ethical conduct, respect the laws in force, not engage in any form of corrupt practices, such as bribery, collusion, corruption in the private sphere 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 Ferreycorp's Compliance System can be found at the following link:
<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.
- 2.15.5. 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 clients, 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 Corporation's customers or suppliers, and therefore will not accept gifts, favors, invitations, commissions, fees, money or income of any kind that transcend the rules of courtesy and commercial standards.

3. STRATEGIES FOR ETHICAL SUPPLIER ACTION

3.1. Supplier Code of Conduct Management

- 3.1.1. Suppliers shall establish, implement and maintain adequate 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 to remain aligned, as well as 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 supplier's facilities 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. Termination of supplier's contract

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 commercial agreement with Ferreycorp in accordance with its terms.

3.4. Complaints channel

In the event of incidents of non-compliance with the guidelines of this policy, all stakeholders of the corporation may make their complaints using the channels established in GEN-GCAC-PRC-010 *Corporate Procedure for handling inquiries and complaints management* of the Corporate Compliance System, as follows:

- Website: https://www.ferreycorp.com.pe/canal_denuncias/
- E-mail: canalddenuncias@ferreycorp.com.pe
- Telephone: 626-4110.
- Mail drop: 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 preceding paragraph.

THIS DOCUMENT HAS BEEN AUTHORIZED IN THE REGULATORY SYSTEM BY:

ROLE	NAME	POSITION	DATE
Developer	Maria Sertzen Baca	NON COMMERCIAL PROCUREMENT MANAGER	Approved – 03/14/2023 13:19
Reviewer	Carolina Navarro SanchezSalazar	ASSISTANT MANAGER OF SERVICES CORP. AND MA	Approved – 03/17/202316:12
Approver	Patricia Gastelumendi Lukis	CORPORATE FINANCE MANAGER	Approved – 03/20/2023 17:46