

	CORPORATE COMPLIANCE POLICY	CODE	VERSION
		GEN-GCAC-PC-002	01
		START DATE OF VALIDITY	END DATE OF VALIDITY
		06/26/2019	06/26/2021
MANAGEMENT IN CHARGE	CORPORATE MANAGEMENT OF CORPORATE AFFAIRS		
PREPARED BY	CHECKED BY	APPROVED BY	
Sandra Leon Salcedo	Eduardo Ramirez del Villar	Mariela Garcia de Fabbri	
SENIOR LEGAL ADVISER	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 Nº 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 Nº 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 Nº 30424, Law Nº 30835, and Legislative Decree Nº 1352 and Legislative Decree Nº 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: canaldedenuncias@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	Sandra Leon Salcedo	SENIOR LEGAL ADVISER	Approved - 10/18/2019 14:06
Checking	Eduardo Ramirez del Villar	CORPORATE MANAGER OF CORPORATE AFFAIRS	Approved - 10/18/2019 14:54
Approving	Mariela Garcia de Fabbri	DIRECTOR	Approved - 10/27/2019 09:08