	CORPORATE DUE DILIGENCE STANDARD FOR CLIENTS, SUPPLIERS AND EMPLOYEES.	CODE	VERSION
		GEN-GCAC-NC-008	03
		START DATE OF VALIDITY	END DATE OF VALIDITY
		01/10/2019	31/12/2027
MANAGEMENT IN CHARGE	CORPORATE MANAGEMENT OF CORPORATE AFFAIRS		
PREPARED BY	CHECKED 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:

Through this general standard, internal policies, procedures, and mechanisms are established to allow the various subsidiaries of the corporation to establish due diligence controls for their clients, suppliers, and employees. The goal is to prevent, through compliance with the procedures and policies described below, becoming involved in any corruption issues or the commission of any related or connected crime.

It is fundamental that all employees detect, know, and investigate the background of the natural or legal people with whom the corporation seeks to interact commercially, both at the start of the relationship and throughout it, especially regarding possible acts of corruption in which they are or could be involved.

The compliance procedures or controls to follow are based on three principles:

1. "Know your customer".
2. "know your partner" or "know your supplier", which demands knowing our counterparty (partner or supplier).
3. "Know your employee"

In this sense, this standard seeks for the corporation's employees to apply due diligence standards in their relations with clients and suppliers, and at the time of hiring personnel.

2. REFERENCE OR CONCORDANCE:

- GEN-GCAC-PC-001: Corporate Code of Ethics.
- GEN-GCAC-PC-002: Corporate Compliance Policy.
- GEN-GCAC-NC-005: Corporate Standard on the Control of Reputational and Corruption Risks in Business with Third Parties.

3. SCOPE:

Applies to all employees of the commercial areas, supply chain, areas that perform direct purchases, and Human Resources areas.

4. CONTENT OF THE STANDARD

4.1. RESPONSIBILITY OF EMPLOYEES IN THE EXECUTION OF DUE DILIGENCE FOR CLIENTS, SUPPLIERS, AND PERSONNEL HIRING

Employees in charge of deciding on the hiring of clients, suppliers, or personnel are responsible for evaluating at the start of the relationship (commercial operation, transaction, contracting of services, or hiring of personnel) that these are not affected by a circumstance that prevents them from relating to the corporation from a compliance perspective.

It is in the corporation's interest to have commercial relationships with third parties and hire personnel who share the same values and ethical principles. Therefore, it is the responsibility of all employees to detect and report any behavior that infringes or contravenes the Corporate Compliance Policy, the Corporate Code of Ethics, and other complementary standards that derive or could derive in criminal acts linked to corruption such as: bribery, collusion, influence peddling, corruption between private parties, money laundering, and terrorism financing.

It must be kept in mind that any situation that could affect clients, suppliers, or employees can negatively influence the corporation's good image, potentially making us responsible or accomplices in a criminal act under the presumption that we knew of such a situation.

In this sense, complementing what is stated in the GEN-GCAC-NC-005 Corporate Standard on the Control of Reputational and Corruption Risks in Business with Third Parties, the following mandatory due diligence controls are established, applicable to the Corporation and each subsidiary as indicated below and in the ANNEXES of this standard.

a) DUE DILIGENCE FOR CLIENTS:

All clients must be subjected to the following general due diligence controls, independent of the process each company has, except for those indicated in ANNEX

The due diligence controls applicable to clients are:

1. Requirement of the following minimum data:
 - In the case of natural people:
 - I. Full names and surnames.
 - II. Type and number of identity document.
 - III. Address.
 - IV. Tax ID Number or equivalent registry for non-domiciled parties.
 - V. Telephone number / email (Optional).
 - In the case of legal entities:
 - I. Corporate name or business name.
 - II. Tax ID Number (RUC) or equivalent registry for non-domiciled parties.
 - III. Corporate purpose, main economic activity, or purpose of incorporation.
 - IV. Identification of the legal representative (names, surnames, ID type, and number).
 - V. Address or principal place of business.
 - VI. Office telephone (Optional).

In cases of credit sales and/or when dealing with equipment within processes controlled by the Prevention of Illegal Mining (UCMI), Money Laundering, and Terrorism Financing (LA/FT) areas, the following controls will apply:

2. Verification in risk centers of the client's credit quality.
3. Application of controls against illegal mining (UCMI) and money laundering and terrorism financing (LA/FT and UIF), through sworn statements and others.
4. Verification of internet news related to acts of corruption by the natural or legal person, as well as their representatives and shareholders.
5. Verification of clients (natural or legal person) domiciled abroad, as well as their representatives and shareholders, to ensure they are not reported in any "International Lists of Interest" (Blacklists such as OFAC, UN, EU terrorist list, SEPBLAC list, among others).
6. Application of anti-corruption clauses in contracts for the sale of goods or services and/or in the terms and conditions of purchase orders and/or quotes.

b) DUE DILIGENCE FOR SUPPLIERS:

All suppliers must be subjected to the following general due diligence controls, except for those indicated in ANNEX 1.

The corporation will not contract with suppliers who do not comply with the due diligence controls established in this standard.

BEFORE CONTRACTING THE SUPPLIER:

1. Application of the supplier homologation process (internal or external). The information obtained shall contain at least:
 - General information (Name, ID, II. Tax ID Number (RUC), Legal Rep, Shareholders).
 - Credit information.
 - Report and/or search for criminal complaints.
 - International Lists report for foreign-domiciled suppliers.
 - Information on their main clients and suppliers.
2. Subscription of a sworn statement of knowledge and submission to the Corporation's Compliance System (Record 2).
3. Application of the Supplier Due Diligence Questionnaire (Record 3).
4. Application of anti-corruption clauses in service contracts and/or purchase order terms.

DURING THE EXECUTION OF THE SERVICE / OR PRODUCT SUPPLY:

1. Awareness training for the supplier on the Corporation's Compliance System (at least once a year).

The Corporate Ethics and Compliance Officer will track the annual training in Record 1: Annual Training Plan for the Compliance System

c) DUE DILIGENCE FOR PERSONNEL HIRING:

All corporation employees must be subjected to the following due diligence controls, except for those indicated in ANNEX 1.

BEFORE HIRING PERSONNEL:

1. Requirement of minimum data: names, ID, address, phone/email, signature, fingerprint, photo, dependent relatives .
2. Applicant's Résumé (CV).
3. Verification in risk centers of credit quality.
4. Psychological exam.
5. Criminal Records.
6. Judicial Records.
7. Police Records.
8. Verification of labor references.
9. Verification of not being reported in "International Lists of Interest" (applies only to SPLAFT areas).
10. Interpol search (applies only to foreign personnel).
11. Application of anti-corruption clauses in labor contracts. *Personnel information will be obtained in accordance with current legal standards, especially the Personal Data Protection Law.*

AFTER SIGNING THE LABOR CONTRACT:

1. Induction talks on the Compliance System (within the first 30 business days).

DURING PERSONNEL'S WORKING LIFE:

1. Virtual training course on the Compliance System (minimum once a year).

5. RECORDS

- 5.1 Record 1: Annual Training Plan for the Compliance System.
- 5.2 Record 2: Sworn Statement for Suppliers.
- 5.3 Record 3: Supplier Due Diligence Questionnaire.

6. ANNEX

- 6.1. ANNEX 1: Application of due diligence exceptions by subsidiary.

RECORD 2: SUPPLIER AFFIDAVIT

	SUPPLIER AFFIDAVIT	Ver. 01
---	--------------------	---------

Sirs:

(NAME OF THE CORPORATION'S COMPANY)

Hereby, I _____ (full name of the legal representative) legal representative of company _____ (Name or corporate name of the Supplier) with Tax ID (RUC) No. _____, identified with ID Card (DNI) No. _____, and power of representation registered at _____, hereinafter **THE SUPPLIER** declare on behalf of the company I represent that we will respect and comply with the following ethical conduct policies of Ferreycorp Corporation and its subsidiaries:

1. **THE SUPPLIER** shall provide all documentation and information required to pass the supplier evaluation and homologation process as a condition for providing services to **(NAME OF THE CORPORATION'S COMPANY)**.
2. **THE SUPPLIER** shall comply with the legislation applicable to its activity as well as 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 Code of Ethics, and internal and external standards related to the anti-corruption program. Likewise, **THE SUPPLIER** shall comply with the Administrative Responsibility of Legal Entities (Law No. 30424), its amendments (Legislative Decree No. 1352 and Law No. 30835), and the regulations on Prevention of Money Laundering and Terrorism Financing (Law No. 27693, Supreme Decree No. 018-2006-JUS, and SBS Resolution 789-2018).
3. **THE SUPPLIER** shall ensure that none of its employees or any person acting on its behalf engages in improper business practices in relationships with any of the Corporation's companies or third parties, whether public or private officials/entities.
4. Neither **THE SUPPLIER** nor its representatives may perform any activity involving the direct or indirect offering or granting of commissions, fees, money, cash equivalents, gifts, or favors and invitations (such as paying for travel, per diems, entertainment, sponsorships, lodging, tips, prizes, discount coupons); nor provide free use of vehicles, materials, facilities, or equipment, whether tangible or intangible, with the exception of promotional or merchandising items, to any employee of **(NAME OF THE CORPORATION'S COMPANY)** or any public official with whom they interact.
5. **THE SUPPLIER** shall communicate in writing within ten (10) business days any relevant change in its company, including changes in shareholding, social object, capital reduction, merger, spin-off, transformation, or any reorganization or amendment to its bylaws.
6. **THE SUPPLIER** declares that its affiliates, main shareholders, or related companies have not been and are not being investigated for illicit activities, and reaffirms the legal origin of its funds.
7. **THE SUPPLIER** recognizes that it is prohibited from accepting, receiving, or requesting

	SUPPLIER AFFIDAVIT	Ver. 01
---	---------------------------	----------------


donations, promises, or any undue advantage for itself or a third party to perform or omit an act to favor another in commercial relationships.

8. **THE SUPPLIER** must avoid influencing the decisions of public officials through real or simulated influence, or through bribes, advantages, or gifts to officials or their relatives.
9. **THE SUPPLIER**, its employees, and representatives are prohibited from any negotiations that could result in the crime of simple or aggravated collusion against **(NAME OF THE CORPORATION'S COMPANY)** or its clients.
10. If any of the aforementioned acts are proven, the criminal, civil, and/or administrative responsibility shall be exclusively attributable to **THE SUPPLIER**.
11. **THE SUPPLIER** is obligated to report any attempt or act of corruption or suspicion of non-compliance to the Ethics Channel of **(NAME OF THE CORPORATION'S COMPANY)**.
12. By signing this document, **THE SUPPLIER** grants **(NAME OF THE CORPORATION'S COMPANY)** the power to perform audits of operations linked to the service provided.
13. **THE SUPPLIER** declares its company and high management are not currently involved in investigations for criminal organizations, money laundering, terrorism financing, corruption, embezzlement, financial fraud, tax evasion, or private corruption. **(NAME OF THE CORPORATION'S COMPANY)** may terminate the contract immediately (Article 1430 of the Civil Code) if **THE SUPPLIER** becomes involved in such processes or provides untruthful information.
14. **THE SUPPLIER** shall protect all information of **(NAME OF THE CORPORATION'S COMPANY)** it accesses and refrain from disclosing it without written authorization. If the supplier is a natural person, they consent to the processing of their personal data.

Signed in ____ on the ____ of ____ 20__.

NAME, SIGNATURE, AND STAMP OF THE LEGAL REPRESENTATIVE

RECORD 3: SUPPLIER DUE DILIGENCE QUESTIONNAIRE

	SUPPLIER DUE DILIGENCE QUESTIONNAIRE	Ver. 01
---	--------------------------------------	---------

GENERAL INFORMATION

FIRM:	<input style="width: 100%;" type="text"/>		
ADDRESS:	<input style="width: 100%;" type="text"/>		
CONTACT:	<input style="width: 100%;" type="text"/>		
WEB PAGE:	<input style="width: 60%;" type="text"/>	RUC (TAX ID):	<input style="width: 30%;" type="text"/>
EMAIL:	<input style="width: 60%;" type="text"/>	TELEPHONE:	<input style="width: 30%;" type="text"/>

MAJOR SHAREHOLDERS OR PARTNERS (Greater than 5% of shares)	NAMES	
	<input style="width: 60%;" type="text"/>	<input style="width: 20%;" type="text"/>
	<input style="width: 60%;" type="text"/>	<input style="width: 20%;" type="text"/>

UPPER MANAGERS	NAMES	
	<input style="width: 60%;" type="text"/>	<input style="width: 20%;" type="text"/>
	<input style="width: 60%;" type="text"/>	<input style="width: 20%;" type="text"/>

DUE DILIGENCE QUESTIONNAIRE

Check the appropriate answer. If the answer is yes, please attach the evidence:

I.	QUESTIONS	YES	NO	ATTACH
1	Does the company have a Compliance Program to prevent corruption in accordance with Law No. 30424, its amendments and regulations and/or pursuant to ISO 37001:2016?			
2	Does the company have a Code of Ethics/Conduct and/or Anti-Corruption Manual and/or Policy, approved and widely disseminated?			
3	Does the company have guidelines and/or policies for the handling of gifts, donations, hospitality, and similar items?			
4	Does the company provide training (training and/or awareness-raising talks) on ethical issues to its personnel?			
5	Has the company appointed a Compliance Officer / Crime Prevention Officer or an equivalent?			
6	Does the company have a grievance mechanism/ethics hotline?			
7	Does the company have an Internal Work Regulation that sanctions employees who perform unethical acts on behalf of the company?			
8	Does the company perform any police and/or criminal background checks on its personnel?			
9	In the last 5 years, have the company's shareholders, managers, legal representatives and/or partners held public office - Politically Exposed Persons (PEP)?			
10	In the last 5 years, have any of the company's shareholders, directors, representatives and/or managers been investigated or charged with any crime, including bribery, corruption, influence peddling, collusion, money laundering and financing of terrorism?			
11	In the last 5 years has your company or a third party filed for insolvency, commencement of insolvency proceedings or liquidation?			
12	Have your activities ever been suspended for having violated applicable laws?			
13	Is the company required to have a system for the prevention of Money Laundering and Financing of Terrorism (ML/FT) and does it report to the FIU-Peru?			

AFFIDAVIT FOR SUPPLIERS

Yes I hereby declare having read, understood and agreed to comply with our Corporate Code of Ethics and Corporate Compliance Policy, available on our website www.ferreycorp.com.pe, and that the information stated herein is accurate and complete.

No

Fill out to confirm that the information provided is true and accurate.

Name and surname of the company's legal representative	<input style="width: 100%;" type="text"/>
Signature	<input style="width: 100%;" type="text"/>
Date	<input style="width: 100%;" type="text"/>

ANNEX 1: APPLICATION OF DUE DILIGENCE EXCEPTIONS BY SUBSIDIARY

1. GENERAL EXCEPTIONS: Applies to all subsidiaries Due diligence controls are exempted for:

- End Consumers: Natural or legal people who are end consumers in the retail channel. Only minimum data requirement applies.
- Large Mining Clients: Clients of the large mining division that apply the highest compliance standards.
- Represented Brands: Strategic suppliers that provide goods for commercialization and apply the highest compliance standards.

2. EXCEPTIONS FOR FERREYCORP

- Due Diligence for Clients: Not applied because its clients are its majority-owned subsidiaries.

3. EXCEPTIONS FOR FARGOLINE, SOLTRAK, FERREENERGY, FORBIS, SITECH:

- Due Diligence for Clients: Application of controls against illegal mining (UCMI) and money laundering and terrorism financing (LA/FT and UIF) through sworn statements and others.
- Due Diligence for Personnel Hiring: Verification of the applicant in "International Lists of Interest" (only for SPLAFT areas).

THIS DOCUMENT HAS BEEN AUTHORIZED IN THE REGULATORY SYSTEM BY:

ROLE	NAME	POSITION	DATE
PREPARED BY	Eduardo Ramirez del Villar	CORPORATE MANAGER OF CORPORATE AFFAIRS.	Approved- 09/12/2022 18:53
CHECKED BY	Eduardo Ramirez del Villar	CORPORATE MANAGER OF CORPORATE AFFAIRS.	Approved- 09/12/2022 18:57
APPROVED BY	Mariela Garcia De Fabbri	GENERAL MANAGER	Approved- 09/12/2022 22:10