

code of Ethics

The sum of individual ethical actions is the founding principle of our **Code of Ethics** at Ferreycorp.

Ferreycorp



Carlos Huamán
Ferreyros

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We are Ferreycorp

Marco Hoyos
Unimaq

Rudy Sánchez
Unimaq

Carlos Alcántara
Unimaq



We are Ferreycorp

Message from our CEO

We, at the Corporation (Ferreycorp S.A.A. and its subsidiary companies), foster an ethical culture based on values. The actions of the Directors, Managers, Officers and workers of the corporation are founded by the guiding principles of our four corporate values: **Commitment, Integrity, Respect and Equity**. We apply these values on a daily basis: in the way we do business, in the decision-making process and in every transparent and equitable relation we establish with our groups of interest. Along the years, we have stood by our principles, which have helped us maintain a sound culture based on always acting the right way. This has earned us the good prestige and reputation we are known for today.

We now have a shared duty to uphold the same values and make the commitment to preserve the Ferreycorp culture. I invite you to take this time to carefully read our **Code of Ethics**, complete the annual trainings related to it, discuss its content with your teams and to submit a complaint in the event of any action deviating from our culture.

Let's say loud and clear: **"INTEGRITY STARTS BY ME"** and I should lead by example every single day.



Mariela García
CEO
Ferreycorp

We are Ferreycorp

Our Culture

A WAY OF BEING AND DOING BUSINESS AT ALL TIMES

We are a corporation of more than 7 thousand workers operating across several countries of the region and we are committed to creating development and growth opportunities for society, our workers and all our groups of interest. In our more than 100 years of history, we've proven to be a leading company in the management of our operations, acting at all times in accordance with our solid values.



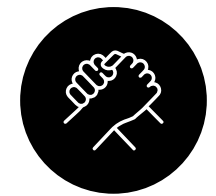
Team Fargoline

Our Purpose

Together we create development

We are Ferreycorp

Our Values



Respect

We celebrate diversity and foster a decent and respectful treatment for everyone.



Integrity

We work with honesty and transparency, being accountable for our actions.



Equity

We base each of our interactions on a fair treatment to all our groups of interest.



Commitment

We acknowledge our role on society and work every day to create major access to opportunities and contribute to the growth and development of the region.

Our values are not negotiable and are the foundation of everything we do at Ferreycorp, both internally and externally.

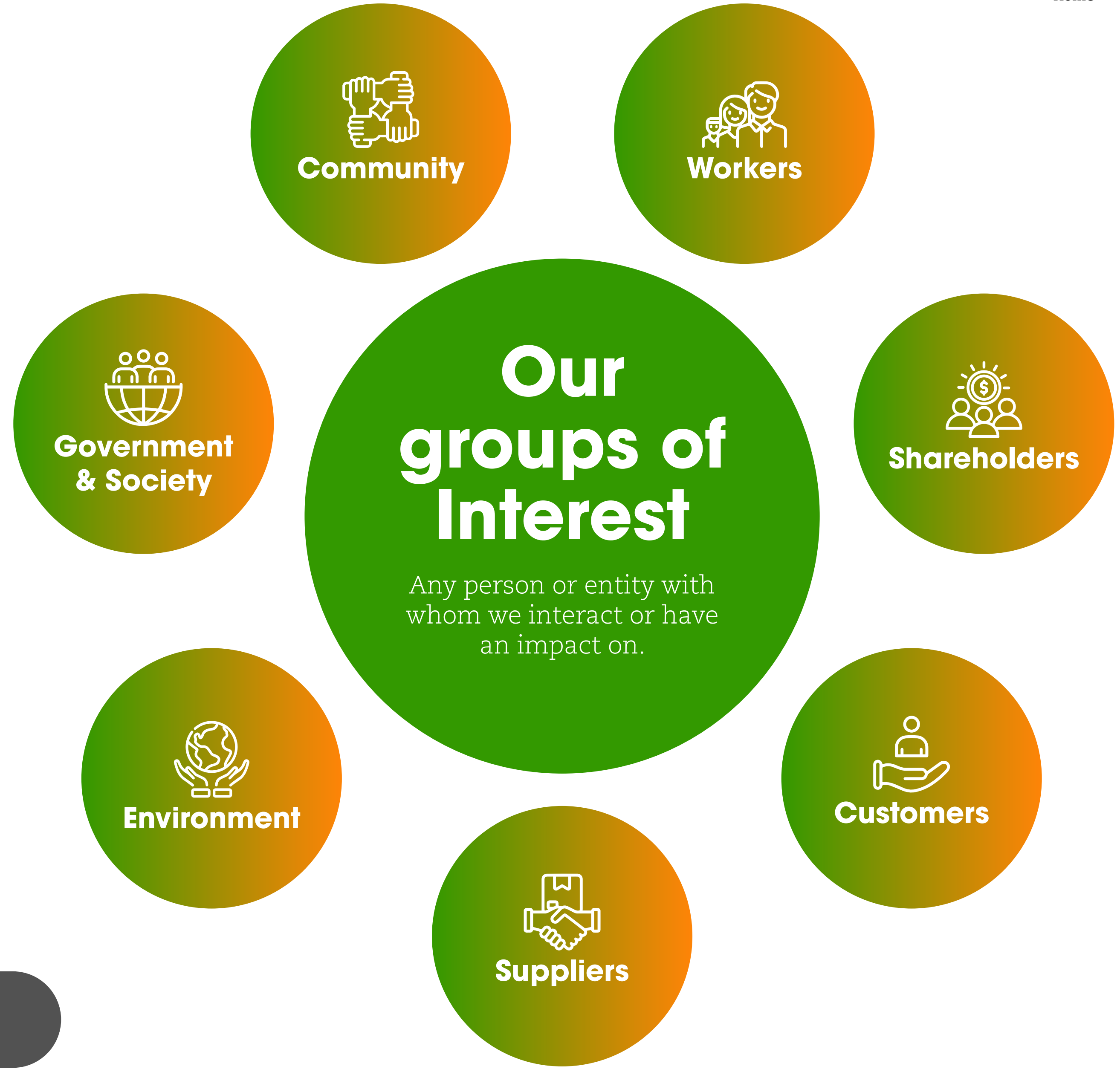


Claudia Coronado
Forbis Logistics

We are Ferreycorp



Haldring Gonzales
Soltrak



We are Ferreycorp

Our groups of interest

How do we interact with our groups of interest?

Workers

- We maintain an equal treatment, without discrimination and fostering inclusion.
- We respect Human Rights.
- We safeguard their health and safety, ensuring better work conditions.
- We provide training and professional development opportunities.
- Foster personal and family development.
- We provide strategic guidance and feedback based on merits.
- We promote a good work environment.



Lizet Ato
Ferreyros

Shareholders

- We implement Good Corporate Governance Principles.
- We respect their rights, maintaining an equitable treatment.
- We ensure the transparency of information.
- We guarantee their value and long-term relations through a multidisciplinary board of directors with plurality of opinions.

Our groups of interest

How do we interact with our groups of interest?

Customers

- We create beneficial/profitable long term business relations.
- We offer high quality products and services.
- We provide specialized services by sectors and segments.
- We permanently monitor the client satisfaction and management of complaints of customer satisfaction and complaints management.
- We maintain a good communication and transparency in our interactions.

Suppliers

- We are transparent in our behavior; act equitably and always comply with our obligations.
- We select them based on objective criteria.
- We share the importance of adhering to the principles of sustainable development.
- We share and encourage the implementation of good practices.
- We contribute to the development of small and medium-sized suppliers at the local level.

Community

- We train young talents in ethical principles through different programs.
- We train operators and technicians in the sectors and activities related to our lines of business.
- We manage projects for the development of the communities.
- We promote corporate volunteering.

We are Ferreycorp

Our groups of interest

How do we interact with our groups of interest?

Government & Society

- We participate, through unions, in proposals and initiatives to promote the development of the country, promoting public-private collaboration.
- We support the development of the country's infrastructure.
- We participate in forums, events and conferences promoting our business vision.
- We foster private investment.
- We share good corporate governance practices.



Estrella Fernández
Forbis Logistics

Environment

- We execute Environmental Management programs.
- We measure the footprint of our operations (water consumption, electricity, gas emissions, carbon footprint, etc.).
- We are permanently updating the product portfolio to eco-friendly alternatives.
- We implement waste reduction and material recycling programs.

Ethics at Ferreycorp

Eduardo Galvez
Soltrak

Ivonne Díaz
Soltrak



Our Code of Ethics

Why do we have a Code of Ethics?

Because at any moment we can confront a situation where doubts regarding what is right or wrong can arise. Even more in countries of our region where corruption has become entrenched in many spheres of society. The only way to act ethically is to based our actions and behavior in our values.

In that sense, our **Code of Ethics** is a document that outlines the expected desired behaviors and specifies those that are not to occur. Thus, it should be a document that should be constantly reviewed to help us make better decisions and guide us in our relation with the different groups of interest (workers, shareholders, customers, suppliers, community, government and society, and the environment).



Who should apply it?

All workers from the different companies of the corporation, including directors.

+ REMEMBER
We can all make a difference because each of us counts to strengthen our ethical commitment.

Emilio Aguilar
General de Equipos

Our ethical commitment

At Ferreycorp, we are committed to align our operations with the ethical principles and standards specified in this document.

The corporation provides training regarding our **Code of Ethics** and pays attention to promote the application of our principles and values in our daily work.

It is our responsibility to learn and respect the standards of our **Code of Ethics** and to enforce this to those we relate with.

We are accountable for the below obligations on our daily tasks:

- 1 We are accountable for our daily work.
- 2 We communicate our ethical principles to our groups of interest as they are part of our value chain.
- 3 We raise our voices when we are aware of any action that deviates from our **Code of Ethics**.
- 4 The corporation applies disciplinary measures and sanctions to those who violate our rules.

Our ethical commitment

1. We assume our responsibility

We act in accordance with our code of ethics at all times, both inside and outside the company, being good citizens, consistent and coherent between what we say and what we do and always being loyal to the company and its resources.

Our leaders will always be with their doors open to help us and guide us on how to proceed, and can also always resort to the Corporate Ethics and Compliance Officer, to present our concerns and/or consult about any suspicion or misconduct against our ethical values. It is our responsibility to report any act contrary to our **Code of Ethics** through the Complaints Channel.

2. We communicate our ethical principles to our groups of interest

We share with our groups of interest (workers, shareholders, customers, suppliers, community, government and society, and environment) the ethical principles that govern us, since, being part of our value chain, any commercial or labor relations must be in compliance with our **Code of Ethics**. Furthermore, we seek to transmit these principles to society as a whole, welcoming national and international initiatives that aimed at this purpose.



Juan Jose Paiva
Ferreycorp

Andrea Iriarte
Ferreycorp

Our ethical commitment


3. We raise our voice

If we find ourselves faced with a situation in which we do not know how to act:

- We get advice, ask questions, clarify our doubts and seek guidance.
- If we know or suspect an activity violates our **Code of Ethics**, the Corporate Compliance Policy, the standards that govern our compliance system, internal rules or the country's regulations in general, we must report it to the Corporate Ethics and Compliance Officer.

The Corporate Ethics and Compliance Officer is responsible for managing the correct application of our **Code of Ethics**. It is the person to whom the director, worker or any third party in general must report any act contrary to our **Code of Ethics** through the Channel of Complaints.


What does that complaint process consists of?



The Corporate Ethics and Compliance Officer will address the complaint and maintain strict confidentiality about the facts and those involved, thus ensuring due protection and sanctioning any type of retaliation against any worker or third party who reports any act through the Complaints Channel.



The Corporate Ethics and Compliance Officer will evaluate the complaint and resolve the case in accordance with the investigation process established in the internal regulations.



If the violation to our Code of Ethics is confirmed, the corresponding sanction will be applied.

Remember that reporting is our responsibility and our duty as workers. In addition, it demonstrates our loyalty to the corporation. Therefore, we must support the Corporate Ethics and Compliance Officer, who will **always maintain absolute confidentiality** of the reported facts.

We can access the Complaints Channel through the following means:

- Mundo Ferreycorp **Intranet**
- **Email:** canaldedenuncias@ferreycorp.com.pe
- **Personal interview with the Ethics & Corporate Compliance Officer:** Eduardo Ramírez del Villar.
- **Call to the Ethics & Corporate Compliance Officer,** Eduardo Ramírez del Villar: 981 970 638.
- **Physical Complaints Mailbox:** Jr. Cristóbal de Peralta Norte #820, Surco, Lima, Perú.



Eduardo Ramírez del Villar
Ferreycorp



Rayza Cruz
Forbis Logistics

Our ethical commitment

4. The corporation applies disciplinary actions and sanctions

The corporation, through the companies that make it up, may apply disciplinary measures and sanction to the collaborators who fail to comply with the rules of our **Code of Ethics**, the Corporate Compliance Policy, the rules that govern our compliance system, the internal rules or the regulation of the country in general; according to the Internal Work Regulations of each company and the corporation, and in accordance with current legal provisions.

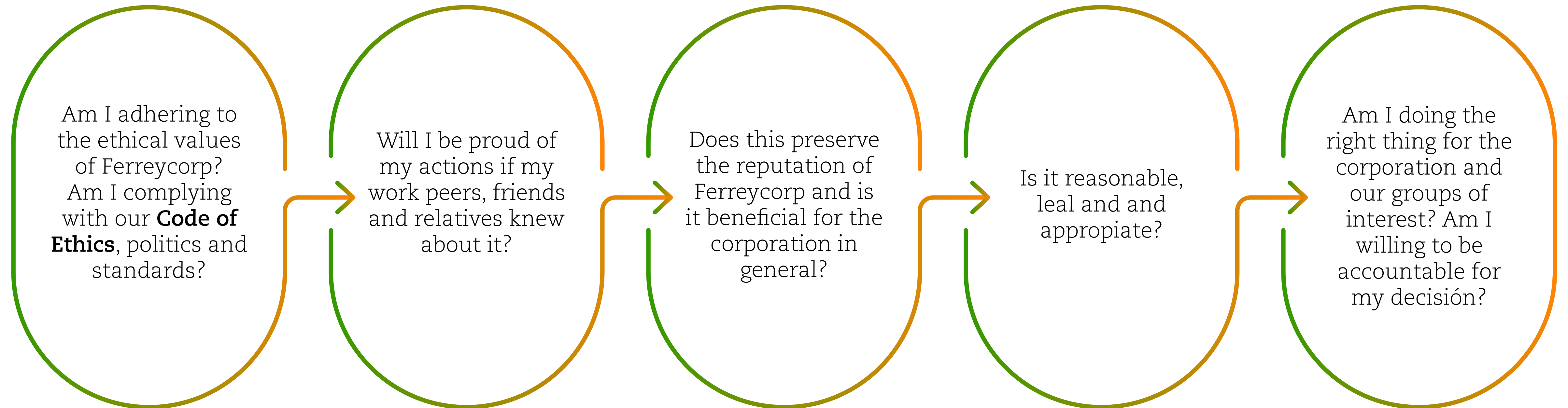
When the CEO or Director of a company is involved in a case of violation of our **Code of Ethics**, it will be the company's own Board of Directors that will apply the corresponding sanction.

+ REMEMBER

Adhering to these guidelines is responsibility of each one of us. Thus, we must be alert to report any improper behavior to ensure the necessary measures are put in place.

How can we ensure we comply with our ethical commitment?

If we find ourselves in a situation where we are not sure how to act, let's ask ourselves the following:



If the answer to ALL of the above is YES, we are on the correct path. Otherwise, DO NOT DO IT.

How can we ensure we comply with our ethical commitment?

Excuses like the ones mentioned below could lead to a violation of our ethical commitment.

“I shouldn’t get involved, it’s not my problem”

“Everyone does it”

“It’s always been done this way, I shouldn’t question it”

“My boss is forcing me”

“It is none of my business, not my work”

“No one will find out”

“It’s not a big deal, it’s not worth reporting it”

“Just this time, I’ll let it pass, it won’t hurt anyone”

“I’ll do something about it if it happens again”

“I am afraid to report it”

“It won’t make a difference if I report it or not”

+ REMEMBER
We must always do the right thing, without exceptions or excuses.

Use of our Code of Ethics

For more clarity on how to use our **Code of Ethics** on our daily operations, we've taken our corporate values as reference.

Team
Unimaq





Kris Córdova
Soltrak



Respect

We show respect when we celebrate diversity and promote a fair and respectful treatment towards others.



Elena Rojas
Ferreycorp

Respect

Our biggest competitive advantage is our human workforce. This is why we celebrate diversity and promote a fair and respectful treatment for everyone.

Our corporation guarantees safe working environment and promotes our wholesome development, both professionally and personally, in the pursuit of excellence.

Respect

Our priority: The worker

We promote harmonious relations, based on mutual respect, solidarity, collaboration and camaraderie. Likewise, we encourage others to act in the same way in their professional and personal spheres.

We are committed to growing professionally by encouraging self-learning and actively promoting different training programs with the aim of developing our capabilities and skills.



We show Respect to strengthen equal treatment for everyone

Moises Loo
Vixora

Respect

Diversity and equal treatment

We recognize and respect diversity, guaranteeing equal treatment for all. We reject and prohibit any type of distinction that seeks or prevents the enjoyment or exercise of our rights, as well as any type of discrimination.

What do we understand by discrimination?

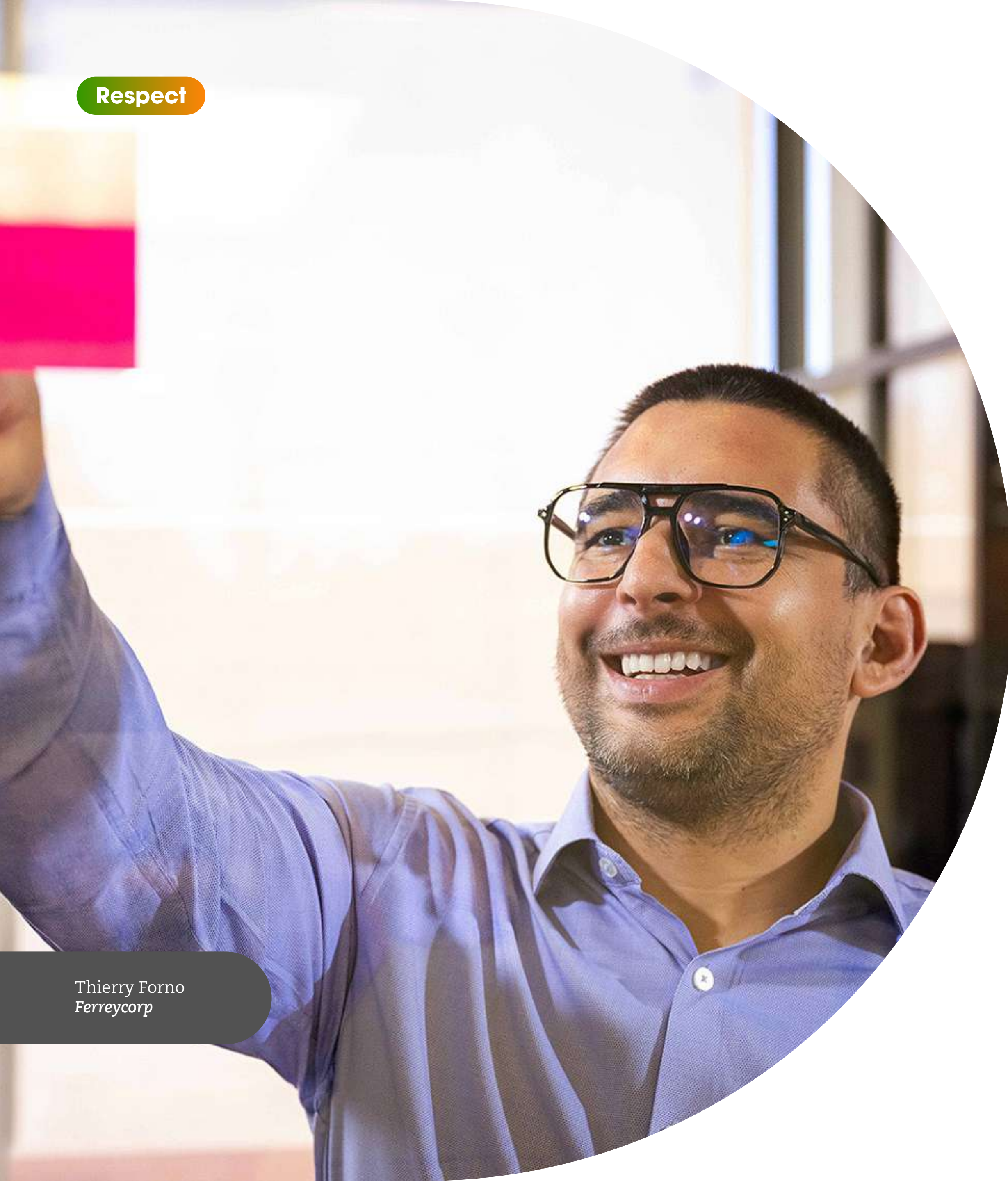
Any distinction, exclusion or restriction that, based on ethnic or racial origin, nationality, sex, sexual orientation, age, disability, social or economic condition, health conditions, personal life, language, religion, opinion or marital status, prevents or nullifies the recognition or exercise of rights and real equality of opportunities.



Daniel Orejuela
Soltrak

+ REMEMBER

We must treat everyone with respect upholding their fundamental rights and dignity. This is why we promote a culture of respect, equity, diversity and inclusion, ensuring equal opportunities for men and women.



Thierry Forno
Ferreycorp

Access to innovation & technology

We promote our development through access to innovation and technological tools, aiming to improve our productivity and competitiveness. To do this, we are constantly learning and training ourselves with the programs offered by the corporation to improve our skills and capabilities, which will allow us to contribute to the success of our companies.

We seek to strengthen long-term relationships with all our stakeholders thanks to our innovative attitude. Therefore, we are always looking for new ways to improve our services to maintain our client's satisfaction.

We foster a culture of constant innovation, promoting the development of new products or services to improve our added value.

Sexual harassment at work

We encourage respect by promoting a workplace free of sexual harassment for everyone.

Sexual harassment at work is a form of violence that is expressed through physical or verbal conduct of a sexual or sexist nature by one or more people towards others, creating a climate of intimidation, humiliation or hostility.

What is considered sexual harassment at work?

Any conduct of a sexual or sexist nature and any actions or behaviors that promote or reinforce stereotypes in which women and men have attributes, roles or spaces of their own, which imply the subordination of a sex or gender with respect to of the other.



Gerardo Ochoa
Orvisa

Pedro Mori
Orvisa

Say Lao
Orvisa

Respect

Sexual Harassment at work

Examples of sexual harassment at the workplace

Sexual conduct

- Sexually suggestive comments.
- Sexually suggestive staring or leering.
- Display of pornographic materials.
- Unwelcome physical touching (touching, hugging without consent).
- Unwelcome requests for sexual favors.

Sexist Conduct

- Making jokes or comments of a sexual nature.
- Humiliating someone based on their gender.
- Assume someone is not trained for a specific task solely based on their gender.

+ REMEMBER

The company ensures adequate protection measures, so we can remain safe from any retaliation after filing a complaint on sexual harassment at work through the Channel of Complaints.

Anyone who violates this policy must be subject to disciplinary sanctions, in accordance with the applicable regulations.

Respect



Ximena Ballarte
Ferreyros

Bullying at Work or mobbing

They are continuous negative behaviors that intimidate, humiliate or create a hostile environment in the work environment. This can be carried out by a co-worker, a line manager, or even subordinates.

How does bullying at work or mobbing impact us?

Bullying at work has a significant impact on the productivity, well-being and mental health of those affected. No worker, regardless of their position, nor third parties who are linked to the corporation's companies must be engage in any form of harassment at the workplace. We must treat everyone with respect and dignity.

Bulling at work o mobbing

Some forms of bullying at work or mobbing

- **Insults and humiliations:** Using offensive language, insulting or humiliating someone constantly and on purpose.
- **Persistent Criticism:** Making unjustified or excessive critics about someone's performance at work with the purpose of affecting their self-esteem.
- **Isolating:** Ignoring, isolating or purposely excluding an employee by not including them on discussions, projects or group activities.
- **Spreading False Rumors:** spreading false or harmful information about someone with the purpose of damaging their reputation.
- **Discriminating actions:** Making offensive comments or jokes regarding genre, religion or any other personal trait of a person.

+ REMEMBER

We can be victims or witnesses of workplace harassment at any time. Therefore, it is important that we inform the Human Resources Department of our company or that we report it through the Complaints Channel. The corporation seeks to ensure a safe and harassment-free working environment for everyone.

We show Respect to stop bullying at work or mobbing

Safety & health

We are responsible for preventing and reporting any event that compromises the safety and health of our workers.

**We Respect
our safety &
health culture**



Ana Díaz
Soltrak

Respect

Safety & health

Safety

We have the obligation to comply with safety regulations to prevent accidents and protect our safety and that of our co-workers, equipment and facilities.

Furthermore, we are obliged to cooperate fully in the event of accidents, force majeure situations and/or accidents, as well as in the prevention of these.

+ REMEMBER

We are empowered to prevent, stop and report any unsafe practices or accidents that take place at our facilities. Safety takes priority over any action or threat that alters the proper functioning of our work or puts us in danger at risk and danger.

Health

We have the responsibility to attend in a timely manner to the screening campaigns that are scheduled, as well as to undergo and pass screening for drugs and alcohol or similar tests, and undertake occupational medical tests.

This is to safeguard our health and safety at work as well as in the tasks we perform.



Team Motored Central America



Integrity

We work in an honest and transparent manner, being accountable for our actions.



Nanci Vásquez
Gentrac

Integrity

We are professional, transparent, honest and diligent in all our relations with our groups of interest. We maintain an impeccable ethical behavior, abiding legal regulations and good practices and in compliance with our internal and external standards. Our actions are aligned with our principles.

We strive for fulfilling all our commitments to our groups of interest, always seeking that our actions do not affect the rights of others.

We inform ourselves about the rules that the corporation must comply with so that our actions and relations are always within the legal framework.

Conflict of interests

We conduct our business with loyalty, autonomy, transparency, impartiality and a high ethical sense, avoiding conflicts between our personal interests and those of the corporation.

When does a conflict of interest occurs?

A conflict occurs when a worker or director has his or her own personal interests or represents the interests of third parties that may:

- Interfere with or conflict with the interests of the corporation.
- Influence their decisions.
- Lead them to show unjustified preferences or act in a biased and non-objective manner.

We perform our business with Integrity

Ana Paula Mejía
Soltrak

Conflict of interests

How to avoid a conflict of interests?

In businesses

We do not participate directly or indirectly (through family or friends) in business with the corporation's companies, as clients, suppliers or competitors, nor do we provide consulting or advisory services to them, unless such situation is brought to the attention of the Corporate Ethics and Compliance Officer so that he can adopt the necessary measures as needed.

In personal activities

We should not accept a direct or indirect benefit in addition to the income that we already receive from the corporation as a result of personal activities that:

- Could distract the time we should dedicate to work.
- Prevent us from fulfilling our work obligations.
- Conflict with the interests of the corporation.

Only in cases where we obtain written authorization from the Ethics and Corporate Compliance Officer should these activities be carried out. This includes educational activities.

With Suppliers

We cannot prioritize or give preference to a specific supplier or business for our direct or indirect benefit, or to benefit family, friends or acquaintances.

We should not seek to receive a direct or indirect benefit from our suppliers, nor seek to favor family, friends or acquaintances in the contracts we make.

Conflict of interests

How should we act in case of conflict of interests?

If we find ourselves in this situation, whoever presents the conflict must distance themselves (refrain) from any decision or activity directly or indirectly related to it and immediately report it to the Corporate Ethics and Compliance Officer by filling out the Affidavit of Conflict of Interest.

If we become aware of a real or apparent conflict of interest involving another worker or third party, we must promptly report it to the Ethics and Corporate Compliance Officer through the Complaints Channel.

+ REMEMBER

In order to be sure if we are in a case of conflict of interests, we should ask ourselves:

Are my personal relations or interests influencing my decisions?

Is this relation affecting my decisions?

Am I favoring my family, friends or acquaintances with my decision?

Am I obtaining a direct or indirect benefit from my decision?

If the answer to any of these questions is **YES**, we are in a case of conflict of interests. Remember that, if you are not sure, we can always look for guidance from the Ethics and Corporate Compliance Officer.

Integrity

Gifts & invitations

We do not give or accept gifts, invitations or others to obtain a personal benefit or achieve commercial goals that may affect our decision when purchasing or selling a good or contracting a service, or that transcends the rules of courtesy and commercial standards.

We act with Integrity to differentiate right from wrong

Hector Capire
Ferreyros

Gifts & invitations

What is acceptable?

- We can give corporate merchandising such as hats, t-shirts, pens, among other, in accordance with commercial standards.
- We can send invitations to national or international events for the promotion, tradeshow or operation of the products or services we offer, in compliance with commercial standards and internal regulations.
- We can accept gifts and invitations for commercial purposes, up to the economical value established by the corporation. If this amount is exceeded, we should hand the gift to the Social Responsibility Division and complete the Affidavit of Goods and/or Invitations received.
- Receive promotional gifts or items in special times of the year where it is common to receive such gifts (anniversaries, commemoration, etc.) in accordance with commercial standards and within the economical value established by the company.
- Accept invitations to national and international events needed in order to learn more about a product or service, in accordance with commercial standards and internal regulations.

What gifts are not allowed?

- Payment or acceptance of commissions.
- Acceptance of payments in cash or its equivalent in vouchers, checks, etc.
- Perform or receive favors to obtain a personal benefit.
- Lend for use or accept, for personal use, any vehicle, materials, facility equipment of any kind to attain business goals.
- Accept or offer tickets, travel expenses, housing and entertainment for events not stipulated in the internal policy.



Team Unimaq

Gifts & invitations

Practical Case

Situation

A worker offered the Logistics Manager of a client tickets for a soccer game in exchange for preference in an equipment purchase contract.

Let's test what we learned

Did the worker behave according to our **Code of Ethics**?

Yes No

Correct answer

NO, because it is wrong to accept gifts to attain commercial goals.

+ REMEMBER

When we offer or accept a gift, let's ask ourselves:

Am I adhering to the gifts and invitations policies, considering the maximum economic value?

Is the gift reasonable and appropriate?

Is it for a legitimate commercial purpose?

Does it avoid the risk of preference in future decisions?

Is it not perceived as an inappropriate conduct?

If the answer to any of these is **NO**, the gift or invitation is not appropriate and should NOT be offered or accepted.

Integrity



Michel Alvarado
Ferreyros

Corruption in relations with third parties

We do not allow any act of corruption under any circumstances. Corruption is a disease that affects the countries in which we operate. At any time, we may be subject to insinuations and requests from corrupt public officials or clients, suppliers and other third parties. Therefore, our corporation has a policy of zero tolerance for acts of corruption.

We act with Integrity and we always reject corruption

Corruption in relations with third parties

When does corruption occurs?

In the public sphere

It can occur when we request or ask either directly or indirectly, to a public servant or person who exercises public functions (governors, mayors, politicians, among others), any object of economic value, donations, favors, promises or advantages for one own's benefit or for another person, in exchange for the performance or omission of any act to favor us, related to a bidding process (tender, contest, award or other) or in the processing of licenses, permits or others.

In our interaction with Government officials, we must maintain an honest conduct, complying with the rules and providing truthful information about the products we offer.

We do not resort to dishonest treatment, nor do we use gifts, favors, invitations, commissions or similar to achieve our goals since we do not seek to unduly influence the decisions that public officials may make.

We must inform regarding the meetings we have with public officials, other than those that correspond to the commercial activity of the business and we must be very careful and responsible in our interactions with them, even outside the workplace.

Likewise, we must inform the Corporate Ethics and Compliance Officer of any unethical or attempted conduct that we are aware of by any public official and seek their advice to adequately address any dishonest request.



Lenin Neyra
Orvisa

Corruption in relations with third parties

When does corruption occur?

In the private sphere

It may arise when a partner, shareholder or any direct or indirect worker accepts, receives or requests a donation, favor, promise, or any other improper advantage or benefit for oneself or for a third party, to carry out or omit one of their responsibilities that allows another to be favored in the acquisition or trade of goods or merchandise, contracting of services or commercial relations.

+ REMEMBER

We can all be the agents of change that our country needs to face corruption, by strengthening the integrity of our relations with third parties.

Corruption in relations with third parties

What can we do in case of corruption?

Reporting any act or indication of corruption is everyone's responsibility. Therefore, the first thing we must do is completely refuse to engage in the act of corruption. Then, we must report it to the Corporate Ethics and Compliance Officer, through the Complaints Channel.

To identify possible acts of corruption, we must pay attention to these “red flags” about people or companies, such as:

- Rumors or past or current inappropriate behavior, including the payment of bribes such as: “Oops, that one is known for kickbacks or facilitation payments.”
- Refusal to adhere to anti-corruption policies.
- Refusal to give information about its partners, shareholders or directors.

José Chávez
General de Equipos



- Has undeclared family or personal connections with the Government.
- Sends gifts or donations to public or private officials.
- Requests payment of a sales commission other than that established in the policy of the company.
- Requests payment in advance for amounts other than those established.
- Refusal to document or report expenses.
- Request payment from third parties.
- Recommends public officials for a job.
- Hires people who will help obtain contracts with the Government.
- Hires third parties recommended by a public official.
- Makes unjustified installment payments.



Alfredo Dávila
Ferreiros

+ REMEMBER

We strictly prohibit:

- The offering of all types of bribes, kickbacks, donations, contributions, gifts, favors, invitations, commissions or similar, either directly or indirectly, through an agent or third party, to a public official or to a natural or private legal entity, to meet or attain commercial goals or benefits, even for the benefit of the corporation, that go beyond of applicable commercial standards.
- The engagement in any act that may lead to situations of bribery, conspiracy, traffic of influence, money laundering and terrorist financing, tax evasion crimes, accounting crimes, customs crimes, attacks against archaeological monuments and crimes against cultural property, among other, which are regulated on the administrative responsibility guidelines of the legal entities indicated in the corresponding regulations.



Ronald Roggero
Forbis Logistics

Money laundering, terrorist financing and other illegal activities

(illegal mining, logging and
fishing, people trafficking,
among other)

We act with Integrity and lawfulness

Integrity

Money laundering, terrorist financing and other illegal activities

Money laundering and terrorist financing

We disassociate ourselves from any action of money laundering, a crime that consists on disguising the proceeds of assets (financial or not) to try to make the sources of their illegal funds look legitimate when in reality they have been obtained or are “profits” generated from serious illegal activities such as:

- Drug Trafficking
- People Trafficking
- Corruption.
- Kidnapping.
- Among other

In other words, it is entering money obtained illegally into the system, in order to “clean it” (disguise it as legal).

These illicit money also serves as fund for other crimes, such as unfair and aggressive competition or the sale of products at a lower price than the real one, because the "launderer" is not interested in winning but rather in "laundering" at least some of your money; business relations are simulated; people's name or reputation are affected, etc.



Luis Martin Cam Fargoline

Integrity

Money laundering, terrorist financing and illegal activities

How can we confront money laundering?

We have a Prevention System for Money Laundering and Terrorist Financing that allows us to detect unusual and suspicious operations of companies that use this illegally obtained money to acquire our goods or services.

With the implementation of control policies and the application of due diligence standards, we make sure we are not exposed to the laundering chain by being complicit in illegal operations. The information obtained is treated with confidentiality and discretion.



Miguel Angel Amaya
Gentrac

What is due diligence?

This is the thorough investigation we must carry out during the collection and verification of information used for the development of our business, especially that of commercial, financial and legal nature.

+ REMEMBER

If an operation seems unusual or suspicious, we must report it to the Financial Intelligence Unit Officer (UIF) if the company has assigned it, or otherwise, through the Complaints Channel.

Integrity

Money laundering, terrorist financing and other illegal activities

Illegal mining, logging and fishing

We do not conduct businesses with companies or people engaged in illegal or informal mining, logging and fishing. This implies, among other things, not buying, selling, renting, transporting or storing goods intended for these activities, or any other activity that involves natural persons or legal entities linked to these illegal activities.



Amed Bernal Ferreyros

What is the difference between illegal and informal mining?

Illegal Mining

It is the mining activity that uses equipment and machinery without complying with the industry's regulations or that is carried out in areas where it is prohibited.

Informal Mining

It is the mining activity that does not have the required permits to operate or is in the process of obtaining them.



Veronica Igreda
Soltrak

Money laundering, terrorist financing and other illegal activities

Illegal fishing and logging

Illegal and unregulated fishing includes illicit activities such as fishing without permission or off season, fishing in protected areas, using prohibited fishing gear, among others.

Illegal logging refers to deforestation. It is the selective and unlicensed harvest of trees and wood in areas protected or restricted by the Government.

+ REMEMBER

If we are aware of an informal or illegal situation that affects a client and that has not been detected by those in charge of the commercial area or the Illegal Mining Control Unit (UCMI), we must report it to said control unit.

Integrity

Contributions to political parties

We comply with the law that prohibits making contributions to political parties or candidates running for public office positions, whether through donations, monetary or in-kind donations, sponsorships or contributions of any nature. This law seeks to prevent that private companies finance political campaigns to obtain some future benefit or advantage.

This prohibition does not apply to contributions that worker could make, in their personal capacity and with their own resources, according to their party and ideological sympathies, in compliance with the established legal norms and limits, and without compromising the name of the corporation and its companies.

+ REMEMBER

For all effects, the corporation is not responsible for any contribution made in our personal capacity.



Luis Pachas
Unimaq

Bryan Araujo
Unimaq



Jorge Canal
Ferreyros



Equity

Each of our actions are based on the fair treatment of all our groups of interest.



Jackeline Campos
Fargoline

Milagros Suarez
Fargoline

Equity

We are honest, fair and equitable in our commercial relations and we ensure our actions do not violate other's people rights. We build long term relations with our clients and suppliers.

Equity

Fair Treatment

We maintain a fair, equitable and respectful treatment with our customers, suppliers, workers and other groups of interest, without privilege or discrimination. Our decisions are based on fairness, so that we can all benefit from it. We treat others how we want to be treated.

Transparency in our actions

We guarantee the transparency of information through the various communication channels we offer. We protect all information related to our internal and external customers, ensuring discretion and confidentiality, keeping it in strict reserve as if it were our own information.



Leiter Flores
Forbis Logistics



Maria Teresa Merino
Ferreycorp

Eduardo Tirado
Ferreycorp

Free competition

The corporation believes in free competition, in attracting and retaining customers by offering quality products and services, competing in the market with fairness, loyalty and transparency under criteria of efficiency and careful attention to the requirements and customer needs.

We are Equitable in our commercial relations

Free competition

The quality of our services and products, as well as the price and delivery time are the criteria we prioritize in our relations with our customers, as well as in the selection of our suppliers, without accepting any remuneration transcending the business relations.

Purchasing decisions shall be taken based solely on the best interests of the corporation under conditions of openness and free competition. Suppliers will gain the preference of the corporation based on the proposed quality and conditions of the products or services they offer.

We provide efficient and quality service. We address their complaints diligently and fairly, recognizing their right to demand what has been offered. We act proactively and efficiently to ensure our customers a quick and timely attention to their needs.

We provide truth, accurate and timely information, showing the value of our products without affecting the reputation of our competitors.

We reject all types of pricing agreement and creation of cartels, in compliance with the standards of purchase, merging and acquisition of companies.

What actions are against free competition?

- Agreements with other competitors to establish prices for a market segment (pricing agreement, cartels, among other).
- Trade monopoly practices.
- Unfair use of a position of power to affect competitors.
- Division of the market or client assignment.
- Restriction of products to certain markets.
- Arraignments during bidding process to eliminate the competition.
- Imposing rules or conducts to clients.

Free competition

Practical Case

Situation

A worker, sales representative, ran into a friend who works for a competitor. As they are both competing for the same clients, the friend proposes to alternate offers so they can split the client and attain both their business goals.

Let's test what we learned

Should the worker accept the proposal?

- Yes
- No

Correct answer

NO, in these situations, we should reject the proposal and report it to our line manager.



José Meza Unimaq

+ REMEMBER
 We reject unfair competition and any type of actions against the principles of free competition.

Equity

Personal data protection

We respect and do not share the personal data of our groups of interest. These include identification information, such as: names, surnames, ID number, address, telephone, email, image, voice, signature, bank details, economic income, racial origin, health information, among others.

The protection of personal data means that we cannot disclose the information entrusted to us to third parties without prior authorization, complying with registering our databases with the competent authority, in accordance with the applicable legal provisions.



Team Ferreycorp

Equity

Personal data protection

Why should we protect personal data?

The disclosure of this data could affect the personal, family or reputational integrity of the person who provides us with said information. Therefore, it is necessary to protect them against inappropriate use through security measures to guarantee their confidentiality, prevent improper processing, unauthorized access, improper manipulation, accidental loss or destruction of data.

What can we do if the security of personal data is compromised?

Notify the corporation's Information Security Area of any misuse or violation of the personal data protection policy.



Jhon Briceño
Soltrak

Ana Díaz
Soltrak

Pedro Salinas
Soltrak

+ REMEMBER
If due to our duties, we access or process personal data of third parties, we are obliged to maintain secrecy and confidentiality, regardless of the format in which they are found.

Intellectual property

It is any human creation, whether artistic, scientific or literary, including software, technological developments, manuals, know-how, symbols, names, brands, images, among others. We appropriately use intellectual property, which is a very valuable intangible asset that we possess, since it is the product of the knowledge acquired over the years and what differentiates us from the competition, constituting a competitive advantage in the market.

+ REMEMBER

Any intellectual creation that we develop in the course of our work does not belong to us since it is the property of the corporation, and as such, the corporation has the right to protect and exploit it.

How should we use intellectual property?

We must use it appropriately, following the guidelines that the marketing area or the brands we represent indicate to us, so we must report any misuse of the intellectual property of the corporation or entrusted to it by the companies represented to the Ethics and Compliance Officer, through the Complaints Channel.



Team Fargoline

Equity

Communication in the media and social networks

The corporation's representatives before the media are the official spokespersons. Therefore, everything we say or publish on behalf of the corporation must be previously validated by the Marketing and External Communication area of the corporation.

The official information of the corporation on social networks is managed by the Corporate Business and Marketing Management of Ferreycorp, in coordination with other companies. Therefore, on our personal social networks, we recommend reposting the official publications made by this area, without modifying their content.

As a corporation we defend free expression. However, as its ambassadors we must act on our social networks in accordance with its principles and values. Therefore, we must avoid publishing photos or information from internal meetings or events that may contain reserved or confidential information. Nor can we make negative comments about competitors, customers, suppliers, workers or third parties.



Lyzeth Vasquez
Ferreyros

Communication in the media and social networks

Practical Case

Situation

A worker is informed that the competition has launched a new product that offers a setting that does not adjust to reality, so he publishes a meme, from his personal point of view, mocking the situation.

Let's test what we learned

Is the worker acting in accordance to our **Code of Ethics**?

 Yes No

Correct answer

NO. We should refrain ourselves from this type of behavior on social networks where information can be understood as the corporation's point of view.

+ REMEMBER

We should not publish in the media or social networks work information or give opinions that may appear to be made on behalf of the corporation.

To the extent possible, when we interact from a personal point of view on social networks, we should try to keep our workplace confidential and ensure that our comments are moderated and consistent with our values, as they can be taken out of context and negatively linked to the company.

Our interaction in social networks with offensive or discriminatory comments, or any type of interaction that may affect the sensitivity of others could cause damage the reputation of the corporation.



Committed

We work hard, with dedication and committed to the development of the corporation.



Fabio Carmona
Soltrak

Commitment

We build and maintain long-term relations with our customers and suppliers.

We act responsibly in all the areas in which we operate, maintaining high standards on ethics, social responsibility, environmental and safety, as well as good corporate governance practices. We seek to be a reference in all the locations where we operate and we contribute positively to their development.

Commitment



Carol Aguilar Vixora

Relations with third parties

We are consistent in our actions; we comply with what we offer and in our daily interactions with our group of interest. The customer and supplier know our history and track record and the principles that govern our actions.

We are interested in having business relation with third parties that share the same values and ethical principles since any situation that affects them can negatively impact us.

We are Committed in our relations with third parties

Commitment

Relations with third parties

What are relations with third parties?

It is the relations we have with customers, suppliers, partners, contractors, subcontractors, among others, in usual commercial operations, such as the purchase and sale of goods or contracting of services; when we form commercial alliances to start new businesses; when we acquire companies, among others.



Bárbara Pitta
Ferreycorp

+ REMEMBER

Before starting any relation with third parties, we evaluate their background to detect possible irregularities or acts of corruption in which they are or may be involved and thus avoid commercial relation with them. To do this, we must carry out a due diligence procedure, requesting personal and/or commercial references, personal background of its shareholders or partners, credit history, reputation and image in the market, among others.

For this, we apply controls based on the principle of “Know your customer/partner/supplier/worker”.

Commitment



Edison Muñoz
Trex Chile

Matías Flores
Trex Chile

Carlos Gonzalez
Trex Chile

Image & reputation

The image and reputation of the corporation is a very precious asset, which we must protect and preserve, since it is how we ensure the continuity and sustainability of the business.

Our actions both in the professional sphere (in the office, in meetings with customers and suppliers, in the corporation's union representation, in social events, in our relationship with the Government and communities, etc.) and in the personal one (law abiding citizens, at all our levels of action) must imply correct and impeccable behavior, based on our shared values.

The success of the corporation is everyone's responsibility. We must act correctly in any interaction or communication in general, avoiding any opinion, comment or statement that could damage our reputation.

Commitment

Interaction with the government & private sector

As part of our principles of corporate social responsibility, we actively participate in different ways with public and private entities in order to collaborate and promote the development of infrastructure in the countries where we operate.

We contribute to the management of social development projects through institutions and business associations to promote the development of the country, assuming our role as good corporate citizens.

We are involved in the execution of public works for taxes that promote the construction of infrastructure in less favored populations, supporting the management of regional and local governments.

We are agents of change, promoting ethical values in future professionals, and promoting the importance of technical careers, through workshops and training.

We collaborate with various business organizations that generate a positive impact in different activities that we support.



Marvin Burgos
Ferreyros



Information management

We handle the information we provide both inside and outside the corporation responsibly.

We know that it is a valuable asset, which must always be true and reliable.

**We are
Committed to
correct information
management**

Richarson Machuca
Orvisa

Commitment

Information management

Confidential information

It is reserved and non-public information, which could benefit any third party, investor or competitor not authorized for its use, if it was to become known, causing serious damage. Confidential information is considered a valuable asset for us.

How can we protect confidential information?

We do not disclose confidential information to outsiders, inside or outside the corporation, unless they have the corresponding authorization, or unless, due to the nature of their work, they require access to that information.

The confidential information that we obtain from clients, suppliers and other third parties in general will be kept strictly confidential as if it were our own.

What is considered confidential information?

- Customers and supplier’s database.
- Information about the corporation workers.
- Information about sales, financial information and business information.
- Unpublished pricing list.
- Internal conversations about business decisions.
- Technical manuals.
- Drawings and equipment designs.
- Documents used in trainings.
- Trade secrets.
- Processes.
- Drawings.
- Other.



Team Ferreycorp

Information management

Practical Case

Situation

A worker by mistake and without knowing shared confidential information from the company with his best friend.

Let's test what we learned

Did the worker act according to our **Code of Ethics**?

Yes No

Correct answer

NO. Even though he disclosed information unintentionally, it is considered a breach of confidentiality. Intention is not relevant in these cases.

+ REMEMBER

When working outside the office, keep the following in mind:

- Avoid having confidential conversations in public spaces.
- When working in public spaces, avoid using a public network and apply security filters to the screen.
- Pay attention not to disclose confidential or sensitive information to relatives.

Commitment

Information management

Privileged and reserved information

It is information not revealed to the market that could affect the share price of Ferreycorp S.A.A. on the Lima Stock Exchange. Those of us who have access to it shall not reveal it to third parties or use it for our own benefit.

We cannot spread specific projections about future operations, growth strategies or relevant operation data. We will also not disclose information about sales made to customers.



Christiam Mendoza Unimaq

What is a “corporate action”?

It is the official communication or channel that Ferreycorp S.A.A. must use to make public information that could significantly influence the decision of a reasonable investor to buy, sell or hold a stock listed on the Stock Exchange, or the liquidity, the price or quotation of the issued shares.

This communication is made through the Governmental Regulatory and Supervisory Entity of the Securities Market (SMV).

When does it stop being privileged information?

When it is communicated to the entire market as a whole, through a “Corporate Action”, under the principle of equal treatment that must be given to all investors.

Commitment

Information management

Information security

The data coming from our business operations, customers, workers, suppliers and groups of interest are considered intangible assets that must be preserved, protected and cared for.

The represented brands trust us with valuable confidential information (access to manuals, know-how and other intellectual property) which must not be disclosed to third parties or be publicly known, through passwords management and restricted use systems. These passwords are entrusted to the corporation's companies, who shared them with its workers for diligent and responsible use.

In this sense, we are responsible and we are committed to protect the resources and information we manage, complying and enforcing the information security regulations.

How can we classify the levels of information security?

We apply information security practices aligned to best practices and international standards, for which information classification levels have been established.

+ REMEMBER

We are prohibited from sharing passwords, using the passwords of others, impersonating or signing for another worker, even when we think it is harmless and will not have negative consequences.

We must report to the Security Officer of any all behavior that represents a violation of the duty of care and protection of the corporation's assets.



Ignacio Arribas
Ferreycorp

Assets care

Assets are all the goods that the corporation owns, whether tangible or intangible, which we use to perform our tasks and successfully achieve our objectives.

**We are
Committed
to the correct use
of assets**

Commitment

Assets care

What good are considered assets?

- Commercial facilities or offices.
- E-mails.
- Vehicles.
- Internet.
- Computers.
- Intellectual Property.
- Telephones.
- Information.
- Office supplies.
- Image assets.
- Inventory.
- Reputation & other intangible assets.
- Other.

The corporation promotes the rational, responsible and adequate use of assets without excesses. It is prohibited to use the corporation's assets for personal or unauthorized purposes, to use confidential information or business opportunities we learn about during the performance of our duties for our own or third party benefit.

How can take care of the assets?

Accepting that any property owned by the corporation that we use to store our objects and personal information, including desks, lockers, vehicles, computers, telephones, etc., be inspected at any time and without prior request.

E-mail and the Internet, as assets of the corporation, are made available to us for the performance of our duties. We must not use them for personal activities other than our work, or in illegal activities, fraudulent and dishonest conduct, or uses contrary to morality. We must not use it for personal purposes.

The corporation is authorized to access said information at any time and verify its proper use.

Commitment

Asset care

Practical Case

Situation

A worker gave the laptop and telephone assigned to him by the corporation to his son who is an entrepreneur.

Let's test what we learned

Did the worker act in accordance with our **Code of Ethics**?

Yes No

Correct answer

NO, because these are work devices that should not be used for personal purposes.



Cristin Guzmán
General de Equipos

+ REMEMBER
In case of doubt, always consult with the Ethics & Compliance Officer.

Commitment



Team Ferreyros

Environmental, social and governance principles

Within the application of the sustainable management model that we adopt, we contemplate the development of the best ESG (environmental, social and governance) practices. To do this, we establish strategies and actions for each of our groups of interest and we incorporate their opinions and expectations in the development of projects and programs aligned with the Sustainable Development Goals of the United Nations (SDG).

We are agents of change in society, demonstrating transparent and ethical behavior and an inclusive and responsible vision.

We are Committed to sustainable growth

Commitment

Environmental, Social and Governance principle

Environment

We must avoid, control and mitigate the damage that our activities may cause to the environment, through practices of sustainability linked to environmental, social and governance, applying the corporate strategy that promotes coherence with these environmental practices.

Also, through the programs of environmental management, we execute, monitor and audit the environmental impact risk mitigation plans. We are focused on managing environmental aspects to reduce the impacts of climate change.

+ REMEMBER

Climate change is affecting ecosystems around the world and it is a phenomenon of great economic and social consequences and it is our responsibility to do something about it.

Sustainable development

Sustainability allows to ensure that our activities are sustainable in time, acting in harmony with the economic, social and environmental aspects; contributing to the development of the communities in which we operate, as well as to the protection of the planet.



Team Trex Colombia

Commitment

Environmental, social and governance principles

What is our role in sustainable development?

Sustainability is a fundamental part of our corporate strategy and is closely linked to our purpose as a corporation, “Together we create development.” The application of the sustainable management model adopted by Ferreycorp contemplates the development of the best ESG (environmental, social and governance) practices. The corporation establishes strategies and actions for each of its interest groups and incorporates their opinions and expectations in the development of projects and programs aligned with the United Nations Sustainable Development Goals (SDG) and with the principles of the Global Compact for the United Nations, of which it has been a signatory since 2004.

Good corporate governance

We are committed to transparent and sustainable government. To achieve this, we have clear board policies, ensuring equitable treatment of shareholders, leading the organization with integrity, fairness and seriousness, guaranteeing transparency of information in the administration of the company, as well as developing areas of control, risk management and compliance.

We assume as our own the international principles of Good Corporate Governance, promoted at the local level by the Superintendency of the Securities Market (SMV).

The adoption of good corporate governance practices promotes a climate of respect for the rights of shareholders and investors in general; contributes to generating value, strength and efficiency in societies; it contributes to better risk management; facilitates access to the capital market; leads to a reduction in the cost of capital, as well as greater and better access to sources of financing and long-term investment; and helps mitigate the failures that exist in the markets due to information asymmetry.



Team Unimaq

Our actions make the difference.

Let's be agents of change and work together to reinforce our Ferreycorp Code of Ethics.



**Integrity
starts with us**

+ferreycorp