PREPARED BY:
Administration and Finance Management

REVIEWED BY:
CEO

APPROVED BY:
Board of Directors

Code: GF – P004
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CORPORATE TAX POLICY

ACEROS AREQUIPA

1. OBJECTIVE

Define the general guidelines for managing the tax affairs of Corporación Aceros Arequipa S.A., its subsidiaries and affiliates, both domestic and foreign (hereinafter, "CAASA").

2. SCOPE

The following tax guidelines apply to CAASA.

3. JUSTIFICATION

According to the provisions established in its Code of Ethics, CAASA is committed to applying good corporate governance principles and being a responsible taxpayer. This policy strengthens and deepens its already established commitments and provides conduct guidelines to ensure clarity and transparency, unified criteria, and compliance with the laws in force in the countries where CAASA engages in its activities.

4. RESPONSIBILITIES

LEVELS OF RESPONSIBILITY	RESPONSIBLE PARTIES
Responsible for implementation and maintenance:	Assistant Accounting Management Tax Supervisor's Office
Responsible for execution:	Administration and Finance Management Assistant Accounting Management Tax Supervisor's Office
Responsible for verification:	CEO Administration and Finance Management Internal Audit Management

5. CONDUCT GUIDELINES

CAASA's decisions on tax matters, as well as its relationships with the relevant authorities, are governed by the following principles:

- Comply with all tax norms issued by the corresponding agencies in the different countries where CAASA operates.

- Adopt tax positions based on economic motives, honest business strategies, and generally accepted practices. CAASA does not use unfair tax planning methods. Minimize tax risks and protect the Corporation's reputation, based on a reasonable interpretation of the tax laws applicable in each country where it operates.

- Promptly pay all applicable taxes, in accordance with the relevant tax laws.

- Not to transfer the value created to tax havens, nor use structures intended to reduce the transparency of transactions or evade or avoid tax payments. To comply with this guideline, CAASA has implemented a tax strategy policy establishing a multi-management committee that evaluates and submits to the Board of Directors for its approval any economic acts or situations to be carried out within the tax planning framework (Anti-Evasion Standard).

- Apply the arm's length principle[1] in transactions between the Corporation's subsidiaries, in accordance with the transfer pricing standards in force in each country.

- Request expert opinions in case of uncertain tax positions regarding relevant transactions.

[1] According to this principle, transactions between related companies must be performed as if they were unrelated parties, i.e., based on market values. OECD, 2006, Annual Report on the OECD Guidelines for Multinational Enterprises: Conducting Business in Weak Governance Zones, OECD, Paris.

- Collaborate with tax authorities based on principles of good faith, professionalism, and reciprocity, without prejudice to any legitimate disagreements that may arise regarding the interpretation of the applicable laws.
- Promptly provide complete information and documentation as requested by the tax authorities.
- When the situation so warrants, order external audits and other internal controls to guarantee the rigorousness and accuracy of the information used in the Corporation's tax management and its compliance with the law.
- Train and guarantee that team members involved in tax management are familiar with this policy and act in accordance with the law.

6. COMPLIANCE

Failure to comply with the principles established in this policy will results in investigations, corrective actions, and/or exemplary sanctions, if the parties involved are found to be responsible.

7. TERM

This corporate policy was approved by the Board of Directors of Corporación Aceros Arequipa S.A. on August 7, 2020. This policy will enter into force as from the date of its approval.