

PREPARED BY:
Human Resources Manager

REVIEWED BY:
Ethics Committee

APPROVED BY:
General Manager

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SEXUAL HARASSMENT PREVENTION, INVESTIGATION, AND PUNISHMENT POLICY

1. OBJECTIVES AND PURPOSE

Establish the mandatory framework and guidelines for action, prevention, and the immediate, effective, and confidential investigation and punishment of possible acts meeting the definition of sexual harassment within CORPORACION ACEROS AREQUIPA S.A. and its subsidiaries (hereinafter, “CAASA”), complying with due legal process.

This policy also seeks to protect the alleged victim and the other parties involved throughout the investigation and punishment procedure for acts of sexual harassment, guaranteeing a discrete, confidential, impartial, speedy, and effective investigation.

Purpose

Determine the commitments assumed within the Company regarding the prevention and punishment of sexual harassment.

Maintain and foster a work environment and culture free of sexual harassment through internal directives that allow for the prevention and punishment thereof at CAASA, as part of its commitment to guaranteeing equality, liberty, and respect in all work relationships. respeto en las relaciones laborales.

2. SCOPE

This policy is of mandatory compliance and application for all team members working at CAASA. The scope of application hereof also includes team members of service and outsourcing companies who have any contact with CAASA personnel.

In certain parts of this document, our references to “team members” are intended to encompass all categories. This does not insinuate the existence of work relationships (where there are none), nor does it involve any interference with the corporate autonomy of third parties. On the contrary, such references guarantee the interest of CAASA in addressing all scenarios in which conducts of sexual harassment may arise.

2.1. Responsibilities

2.1.1. Team members and personnel providing services at CAASA facilities

Comply with the provisions established in this Policy

2.1.2. Sexual Harassment Intervention Committee

The main duty of the Sexual Harassment Intervention Committee (hereinafter, the “Committee”) is to investigate and issue a Report with the proposals and/or recommendations for punishment or other measures to avoid further cases of sexual harassment, which shall be submitted to the Human Resources Area.

Its structure guarantees worker participation in the sexual harassment investigation and punishment procedure.

2.1.3. Human Resources Management (hereinafter, “GGH”)

Issue the final decision after reviewing the Committee’s report. This decision shall indicate, where applicable, the disciplinary measures to be applied, as well as any steps necessary to avoid new cases of sexual harassment.

Inform and share this Policy with all personnel providing services at the Company’s facilities.

Guarantee compliance with the provisions established in this Policy.

3. NORMATIVE OR REFERENCE FRAMEWORK

3.1. Peruvian Constitution.

3.2. Law 27942 - the Sexual Harassment Prevention and Punishment Act, as amended (the Law).

3.3. Executive Order (Decreto Supremo) 014-2019-MIMP, approving the Regulations on Law 27942 - the Sexual Harassment Prevention and Punishment Act (Regulations).

3.4. Law 28983 - Equal Opportunities for Men and Women Act.

3.5. Executive Order 003-97-TR - Consolidated Text (TUO) of the Labor Productivity and Competitiveness Act (hereinafter, the “LPCL”).

3.6. Law 28518 - Training Schemes Act (Law 28518).

3.7. Code of Ethics.

3.8. Internal Workplace Regulations (RIT).

4. DEFINITIONS

Sexual harassment is a form of violence that consists of conduct of a sexual or sexist nature or connotation that is unwanted by the person toward whom it is directed. It may create an intimidating, hostile, or humiliating atmosphere¹ that can affect work activity or situations.²

Sexual harassment may occur from the very first incident and does not require explicit rejection before being reported.

Sexual harassment can be directed toward any person, regardless of age, sex, sexual orientation, gender identity, nationality, physical appearance, or the like.

4.1. Conduct of a sexual nature

Physical, verbal, gestural, or other behavior or acts with a sexual connotation, such as comments and innuendos; lascivious observations or looks; exhibition or exposure of pornographic material; sexual touching; virtual contact, and others of a similar nature.

4.2. Sexist conduct

Behaviors or acts that promote or reinforce stereotypes according to which women and men have their own attributes, roles, or spaces that presuppose the subordination of one sex or gender to the other.

4.3. Harassment perpetrator

Any person who engages in one or more acts of sexual harassment.

4.4. Harassment target

Any person who is the victim of sexual harassment.

4.5. Complaint or grievance

Action through which a person informs his or her employer, whether verbally or in writing, of events that allegedly involve acts of sexual harassment.

¹ It may cause different effects:

- (i) Psychological effects: Feelings of sadness, anxiety, fear, guilt, shame, rage, emotional instability, stress, depression, etc.
- (ii) Physical effects: Functional and/or organic health problems such as insomnia, tachycardia, migraines, alterations in digestion, etc.
- (iii) Other effects: Changes in the victim's affective or family life.

² For example: Decrease in productive capacity at work; being subjected to negative consequences for expressing rejection, such as retaliation; desire to leave his or her job, etc.

4.6. Accused party

Person against whom the complaint or grievance has been submitted for sexual harassment.

4.7. Accusing party

Alleged victim or person who knows of an alleged act of sexual harassment.

4.8. Relationship of authority

All bonds existing between two people in which one of them has the power to direct the activities of the other, or holds an advantage over them. This concept includes relationships in which one person reports to another.

4.9. Relationship of subjection

All bonds arising within the framework of providing a service, training, or similar relationships in which one person has influence over another.

4.10. Sexual Harassment Intervention Committee (CIHS)

Committee responsible for investigating and issuing recommendations for punishment and any other additional measures to prevent new cases of sexual harassment. The purpose of this committee is to guarantee workers' participation in the procedure for the investigation and punishment of sexual harassment.

4.11. Advantageous situation

A situation in which there is no defined position of authority but one individual has the power to influence the other, even if the people involved in an act of sexual harassment are hierarchical equals.

5. GUIDELINES

5.1. CAASA's commitments under this internal policy

At CAASA, respect for individuals is one of our core values. As such, we categorically reject sexual harassment or any other conduct that may affect others' honor or dignity. CAASA thus allocates efforts and resources to guarantee compliance with this policy through the following actions:

5.1.1. Prevention of situations of sexual harassment

CAASA, acting through the GGH, prioritizes the implementation of preventive measures against acts of sexual harassment. As part of these measures, the GGH will perform:

a. Annual evaluations to identify possible situations of sexual harassment or the risk of the occurrence thereof. These actions may form part of work environment surveys through the inclusion of questions about sexual harassment.

b. Training on the topic of sexual harassment:

* For team members in general: At the start of the employment relationship and as part of periodic training programs.

* For specific roles, specialized annual training will be provided for:

- The Human Resources Area (GGH)
- The Sexual Harassment Intervention Committee

These trainings aim to raise awareness of the importance of fighting sexual harassment, identifying such situations, and providing information on the different channels for reporting complaints or grievances.

c. The periodic dissemination of information to help identify conducts that constitute acts of sexual harassment and the applicable disciplinary measures.

d. The public, high-visibility dissemination of channels for reporting complaints or grievances, making available to all team members the corresponding forms for filing complaints or grievances.

e. Handing out and dissemination of basic information on the sexual harassment prevention and punishment procedure.

5.1.2. Timely protection of the sexual harassment victim

CAASA, acting through the GGH, prioritizes the need to guarantee protective measures for the victim and/or witnesses of sexual harassment in order to protect and ensure the wellbeing of said individuals against any danger related to the reported acts.

5.2. Elements of the act of sexual harassment

- To be considered sexual harassment, it is not necessary to prove that the conduct of the perpetrator is repeated or that the victim's rejection of such conduct has been expressly communicated.
- Repeated instances of such conduct may be considered evidence.
- Sexual harassment can occur regardless of whether there is a hierarchical relationship between the individual being harassed and the person harassing them.
- Sexual harassment can occur during or outside of the workday, and inside or outside the facilities of CAASA.

5.3. Manifestations of sexual harassment

Sexual harassment can manifest itself through the following conducts:

- Implicit or explicit promises made to the alleged victim that they will receive preferential and/or beneficial treatment regarding their current or future situation in exchange for sexual favors.
- Threats or acts involving implicit or explicit demands for a conduct that is unwanted by the alleged victim, or that attacks or violates their dignity.
- Use of terms of a sexual or sexist nature or connotation (whether written or verbal) sexual innuendo, sexual propositions, obscene gestures, or the display through any means of images with sexual content, that are intolerable, hostile, humiliating, or offensive to the alleged victim.
- Behavior or acts that promote or reinforce stereotypes according to which women and men have their own attributes, roles, or spaces that presuppose the subordination of one sex or gender to the other.
- Invasion of personal space, rubbing up against or touching another individual, or other physical conduct of a sexual nature that is offensive to and unwanted by the person being harassed.

- Threats of termination made against the person being harassed due to refusal to agree to a proposal of a sexual nature.
- Offensive or hostile treatment due to the rejection of the aforementioned conducts.
- Sexual harassment via social media and other online spaces (cyber-harassment).
- Other conducts that meet the definition of sexual harassment established in Article 4 of the Law.

5.4. Obligations of CAASA

CAASA is obligated to prevent, discourage, avoid, and, where necessary, punish cases of sexual harassment in all types of relationships that exist in the workplace. For such purpose, the following measures shall be adopted:

- Create a Sexual Harassment Intervention Committee, in accordance with the procedure established by law.
- Adopt necessary and immediate measures to protect alleged victims of sexual harassment and/or to put a stop to threats or acts of retaliation by the alleged perpetrator.
- Guarantee compliance with the sexual harassment prevention and punishment procedure, as set forth in this Policy.
- Avoid exposing the alleged victim to situations of revictimization.
- Ensure confidentiality in the procedure for the investigation and punishment of sexual harassment in the workplace.
- Inform the Ministry of Labor and Employment Promotion (MTPE) whenever a complaint or grievance is received, or when an ex officio investigation is opened into acts of sexual harassment, and report the protective measures implemented in favor of the alleged victim, within a term not to exceed six (6) business days after receiving it.
- Inform the MTPE of the final decision of the GGH or the body acting in its stead, within a term of six (6) business days after it is issued, regarding the disciplinary measures to be applied, where necessary, and the measures aimed at avoiding new cases of sexual harassment.

- Guarantee that the person who filed the complaint or grievance has access to suitable protective measures to safeguard their rights, as well as any other measures necessary to avoid new cases of harassment, respecting the legal framework in place.

In the event that the perpetrator is the employer or a member of the management, salaried personnel, owner, partner, or director:

- The victim may choose between taking action to put a stop to the hostilities or receiving an indemnity payment, thus terminating the employment contract, in accordance with Article 35 of the LPCL.
- It is not necessary for CAASA to be informed of the intention to put a stop to the hostilities, as established in Article 30 of the LPCL.
- The right of the alleged victim to sue for damages and losses suffered due to the act of sexual harassment shall be safeguarded.

None of the foregoing channels affects the victim's right to appeal to the competent Labor Inspection Authority.

5.5. Sexual harassment investigation and punishment procedure

5.5.1. Purpose of the Procedure

Protect the victim throughout the procedure and punish individuals found to have engaged in acts of sexual harassment.

5.5.2. Rules of the Procedure

All persons involved in the investigation and punishment of sexual harassment shall comply with the following guidelines:

- Act discretely and ensure the confidentiality of the evidence provided by the alleged victim or a third party, and the confidentiality of all information obtained during the course of the investigative procedure.

ii. Ensure that the victim and the alleged perpetrator are given all the rights and guarantees inherent to the procedure, such as the right to set forth their arguments, the right to offer and furnish evidence, and the right to a well-reasoned decision based on appropriate legal grounds within a reasonable amount of time.

iii. Guarantee equality and non-discrimination based on the gender of the alleged victim and the alleged perpetrator.

iv. The GGH, the CIHS, and all persons involved in the investigation process shall make sure not to expose the alleged victim to situations of revictimization, whether by requesting repeated statements regarding the facts, holding face-to-face meetings with the alleged perpetrator, or questioning their conduct or their personal life, etc.

v. Prohibition of revictimization. The call for evidence may not expose the alleged victim to situations of revictimization, such as requesting repeated statements regarding the facts, holding face-to-face meetings with the alleged perpetrator(s), or questioning their conduct or their personal life. The members of the bodies participating in the procedure shall avoid any act that may directly or indirectly discourage the victim from filing a complaint or grievance or from continuing with the procedure.

5.5.3. Start of the Procedure

The procedure may be initiated ex parte, at the request of the alleged victim or a third party, or ex officio when CAASA learns, through any means, about the events that allegedly constitute a case of sexual harassment.

The alleged victim may be an employee of CAASA, an individual working in a labor training program, contractors' personnel, or employees of service providers or outsourcers who have contact with CAASA personnel as part of their work duties.

When the alleged victim and/or alleged perpetrator are the employees of a contractor, service provider, or service outsourcer, the procedure established in section 5.11 of this Policy shall be followed.

- The complaint or grievance may be filed with the GGH or the body acting in its stead. The company's ethics committee will then be informed for the respective follow-up.
- The channels for the submission of complaints and grievances at CAASA are as follows:

- **In writing**

The complaint or grievance may be submitted to the GGH in a sealed envelope marked "Report of an Act of Sexual Harassment." Complete confidentiality shall be ensured in the receipt and consideration of the information.

- **In person/verbally**

The reporting party may submit the complaint or grievance to the GGH verbally, for which purpose they shall be given the Verbal Complaint or Grievance Form contained in the annexes to this Directive.

Complete confidentiality shall be ensured in the consideration of the information.

- **Online**

The complaint or grievance may be submitted via email to denunciaHS@aasa.com.pe.

In all of the abovementioned channels, complete confidentiality shall be ensured for the receipt and consideration of the information.

In the event that the alleged perpetrator is the head of the GGH, the complaint or grievance shall be submitted to the party or body immediately superior to the GGH in the organization.

All information involved in the procedure shall be documented in writing or by any other means to which the parties can gain access.

The persons involved in the sexual harassment investigation and punishment procedure are obligated to maintain confidentiality, keeping the identity of the alleged victim and the person filing the complaint or grievance secret from persons not involved in the procedure. The names of the witnesses shall also be kept confidential, if they so request.

5.6. Protective measures

5.6.1. Medical and Psychological Care

Once the complaint or grievance has been received, the GGH or the party acting in its stead shall make available to the alleged victim, within a term not to exceed one (1) business day, the health services necessary for medical, physical, and mental or psychological care. The report(s) issued as a result of the care provided may be included in the procedure and considered evidence, if so authorized by the victim.

CAASA provides guidance and support services for victims of sexual harassment in the workplace, which include:

- Legal orientation on the alternatives available to victims.
- Legal assistance in carrying out internal procedures and judicial proceedings.
- Psychological guidance for emotional containment and the preparation of psychological reports that may be used as evidence, with the victim's authorization, during the aforementioned procedures and proceedings.

Without prejudice to the internal channels detailed hereinabove, each employee of CAASA may use the services made available by the Ministry of Labor and Employment Promotion via:

- Website: <https://trabajasinacoso.trabajo.gob.pe/tesths/inicio>
- Toll-free hotline: 1819
- in-person services: Av. Salaverry 655, District of Jesús María (between the hours of 8:15 a.m. and 5 p.m.)

5.6.2. Specific Protective Measures: Declaration and Implementation

The GGH shall define and carry out protective measures for the victim within a term not to exceed three (3) business days. These measures may include:

- a. Rotation or change of the alleged perpetrator's work area.
- b. Temporary suspension, with pay, of the alleged perpetrator.
- c. Rotation or change of the alleged victim's work area, if so requested by the victim.
- d. Filing of a request with the competent body or authority for a restraining order barring the alleged perpetrator from approaching the victim or his/her family or communicating with the victim in any way.
- e. Other measures designed to protect the victim or protect his/her wellbeing.

The GGH responsible for issuing protective measures in favor of the victim may also issue certain protective measures in favor of witnesses, wherever such measures are necessary to guarantee their collaboration with the investigation.

By ex parte request, the protective measures may be expanded or substituted, depending on the circumstances of each case, with the proper justification, ensuring that the decision is reasonable, proportional, and beneficial to the victim.

CAASA must grant the necessary facilities to ensure that the workers or third parties filing the complaint or grievance can gain access to health services and report and/or carry out any other act as a result of the sexual harassment. Offering the victim vacation time if he/or she has not requested it shall not be considered a valid protective measure.

5.6.3. Notification of the CIHS

Within a term not to exceed one (1) business day after receiving the complaint or grievance, the GGH shall notify the Sexual Harassment Intervention Committee so that it can begin the investigation.

5.6.4. Notification of the Ministry of Labor and Employment Promotion

CAASA shall report to the MTPE that it has received a complaint or grievance, or has initiated an investigation ex officio into incidents of sexual harassment. CAASA shall also inform the MTPE of the protective measures granted to the alleged victim within a term not to exceed six (6) business days after receiving the complaint or grievance.

5.6.5. CIHS Report

Within a term not to exceed fifteen (15) calendar days after receiving the complaint or grievance, the Committee shall issue a report, which must contain:

- a. Description of the events.
- b. Evaluation of the evidence.
- c. Well-reasoned proposal for disciplinary actions or closing of the case.
- d. Recommendations on additional measures to avoid new cases of harassment.

The report shall be submitted to the GGH or the party acting in its stead within a term not to exceed one (1) business day.

5.7. Disciplinary measures and other additional measures

The area responsible for applying disciplinary measures at CAASA is the GGH. This body shall issue a decision within a term not to exceed ten (10) calendar days after receiving the report. During this term, the GGH shall inform the alleged perpetrator of its decision, granting him or her a term of two (2) business days to present any defense arguments he or she deems relevant.

The decision shall contain the punishment to be applied, as well as other measures to avoid new cases of sexual harassment.

When determining the severity of the conduct of sexual harassment, the criteria of reasonability and proportionality shall be taken into account. Aggravating factors include repeat offenses and the concurrence of two or more acts of sexual harassment.

CAASA may not apply disciplinary measures that favor the alleged perpetrator's work situation, nor deem any previously applied protective measures to be a form of punishment.

The types of punishments to be imposed, depending on the circumstances of each case, may be:

- Termination, in accordance with Article 25, Item i) of the LPCL. In this case, the terminated party shall have the right to file a complaint via judicial channels seeking the annulment of the termination or the payment of indemnity for wrongful dismissal.
- Suspension from work without pay.
- Verbal and/or written warning.
- Termination of the service agreement.

The resignation, termination, or end of the alleged victim's contractual relationship with CAASA shall not exempt CAASA from its responsibility to initiate or continue the procedure to completion, and, if applicable, to apply the corresponding disciplinary measures.

Resolutions imposing disciplinary measures shall be recorded in the personal employee file of the individual found to have engaged in acts of sexual harassment.

5.8. Actions in case of evidence of the commission of a crime

Acts of sexual harassment in the workplace may also meet the definition of sexual harassment established in Article 176-B of the Penal Code, which reads as follows:

“He who, in any way, stalks, pursues, harasses, bothers, or seeks to establish contact with or proximity to a person, without the consent thereof, to engage in acts with a sexual connotation, shall be punished by no less than (3) and no more than five (5) years’ imprisonment, plus ineligibility, as applicable.”

In such cases, we are dealing with a crime that must be reported to the police or the district attorney's office so that it may be investigated and punished.

Therefore, if, during or as a result of the procedure, evidence of the commission of a crime is detected, CAASA shall report such facts to the Government Attorney General's Office, the Peruvian National Police, or other competent institutions, with the knowledge of the alleged victim, within a term not to exceed twenty-four (24) hours after becoming aware of the facts.

5.9. Guarantees of the procedure

- Throughout the investigation procedure, respect for due process shall be ensured for both parties. At a minimum, the alleged perpetrator shall be informed of the acts of which he/she is accused, and, during the term established for the investigation, submit his/her defense arguments within a term not to exceed five (5) calendar days and be permitted to submit any evidence he/she deems relevant.
- Within the term provided for the investigation, the CIHS may carry out any actions it deems relevant and advisable to clarify the facts. Specifically, it may:
 - Meet with the alleged victim, the alleged perpetrator, and possible witnesses to take their statements (in writing) regarding the events under investigation.
 - Gather suitable supporting evidence (witness statements; public and/or private documents; audio recordings; emails; videos; text messages; photographs; objects or the like; reports from psychologists, forensic psychiatrists, or handwriting experts; biological or chemical analyses; or any other suitable evidence), which shall be evaluated by the members of the Committee to determine whether or not the alleged acts were committed.
 - Others.
- The gathering of evidence may not expose the alleged victim to situations of revictimization, whether by requesting repeated statements regarding the facts, holding face-to-face meetings with the alleged perpetrator, or questioning their conduct or their personal life, etc.
- CAASA shall keep the identity of the alleged victim and the person filing the complaint or grievance secret from persons not involved in the procedure. The names of the witnesses shall also be kept confidential, if they so request.

5.10. Special circumstances

To guarantee the objectivity and impartiality of the investigation and punishment procedure, CAASA has established appropriate measures in case of the following situations:

- **In the event that one of the members of the CIHS is involved in an allegation of sexual harassment:**

The Committee shall exclude the member(s) involved during its analysis of the case and shall request their temporary replacement, if necessary.

- **In the event that the complaint involves a manager:**

The case shall be reviewed and investigated with the additional support of the Company's Ethics Committee.

- **In the event that the complaint involves a member of the senior management:**

The case shall be reported to the Audit and Risk Committee of the Board of Directors.

- **In the event that the complaint involves a member of the Audit and Risk Committee:**

Such cases must be reported to the entire Board of Directors.

5.11. Extended scope: cases of sexual harassment involving service outsourcing or intermediary companies

This procedure shall also apply when the two parties involved in the investigation do not work for the same company. As such, third-party personnel shall be provided with and trained in this procedure, without this meaning that such personnel have any direct employment relationship with CAASA.

The scenarios and considerations to bear in mind are as follows:

A. When the alleged perpetrator works for a service intermediary or outsourcer and the alleged victim is part of CAASA:

- The complaint shall be filed with CAASA. Within a term not to exceed one (1) day after receiving the complaint or grievance or becoming aware of the events, CAASA shall report the complaint or grievance to the service intermediary or outsourcer so that it can take any measures it deems relevant.

- CAASA shall carry out the investigation procedure through its Sexual Harassment Intervention Committee, issuing the corresponding report and announcing any protective measures.

- If the final report of the CAASA Sexual Harassment Intervention Committee includes recommendations on disciplinary measures and other additional steps to prevent new cases of harassment, it shall be sent to the service intermediary or outsourcer so that it can apply the punishment or disciplinary measures.

B. When the alleged victim of sexual harassment works for a service intermediary or outsourcer and the alleged perpetrator is part of CAASA:

- The complaint or grievance shall be filed with CAASA. Within a term not to exceed one (1) day after receiving the complaint or grievance or becoming aware of the events, CAASA shall report the complaint or grievance to the service intermediary or outsourcer so that it can take any measures it deems relevant.

- For such purposes, it is hereby guaranteed that the alleged victim may file the complaint directly, without any limitation.

- CAASA shall carry out the investigation and disciplinary procedure in accordance with this policy, guaranteeing that the victim may report or submit a complaint or grievance against any acts of sexual harassment he or she may have suffered.

C. When the alleged perpetrator and the alleged victim both work for a service outsourcer or intermediary and the act of sexual harassment occurs within the scope of oversight or during the performance of the service they provide to CAASA:

- The alleged victim may file the complaint directly with the service outsourcer or intermediary or with CAASA. In the latter case, CAASA shall send notice of the complaint or grievance to the company to which the alleged perpetrator belongs within a term not to exceed one (1) business day after receiving it.

- The service outsourcer or intermediary shall be responsible for the investigation and disciplinary procedure, without prejudice to the corresponding coordination and follow-up.
- The investigation procedure does not imply the recognition of any employment relationship between the accused, the accuser, or the reporting party and CAASA.

6. VALIDITY AND REVOCATION

This Corporate Policy was approved by the General Manager of Corporación Aceros Arequipa S.A. on March 30, 2020. This Policy shall enter into force as from the date of its approval.



ANNEXES

1. SEXUAL HARASSMENT REPORTING FORM³:

- Reporting Party:
- National Identity Document (DNI):
- Company for which you perform services:
- Accused party or parties:
- Company for which the accused perform(s) services:
- Relationship between the reporting party and the accused⁴:

I do hereby state that I have been duly informed in matters of sexual harassment prevention and punishment. I recognize the importance of ensuring that my statement is entirely accurate with regard to the events giving rise hereto:

YES	SIGNATURE
DATE	

**ACEROS
AREQUIPA**

³ The conducts that may be reported are as follows:

- Sexual: Physical or verbal behaviors or acts, gestures or others of a sexual connotation.
- Sexist: Behaviors or acts that promote or reinforce stereotypes according to which women and men have their own attributes, roles, or spaces that presuppose the subordination of one sex or gender to the other.

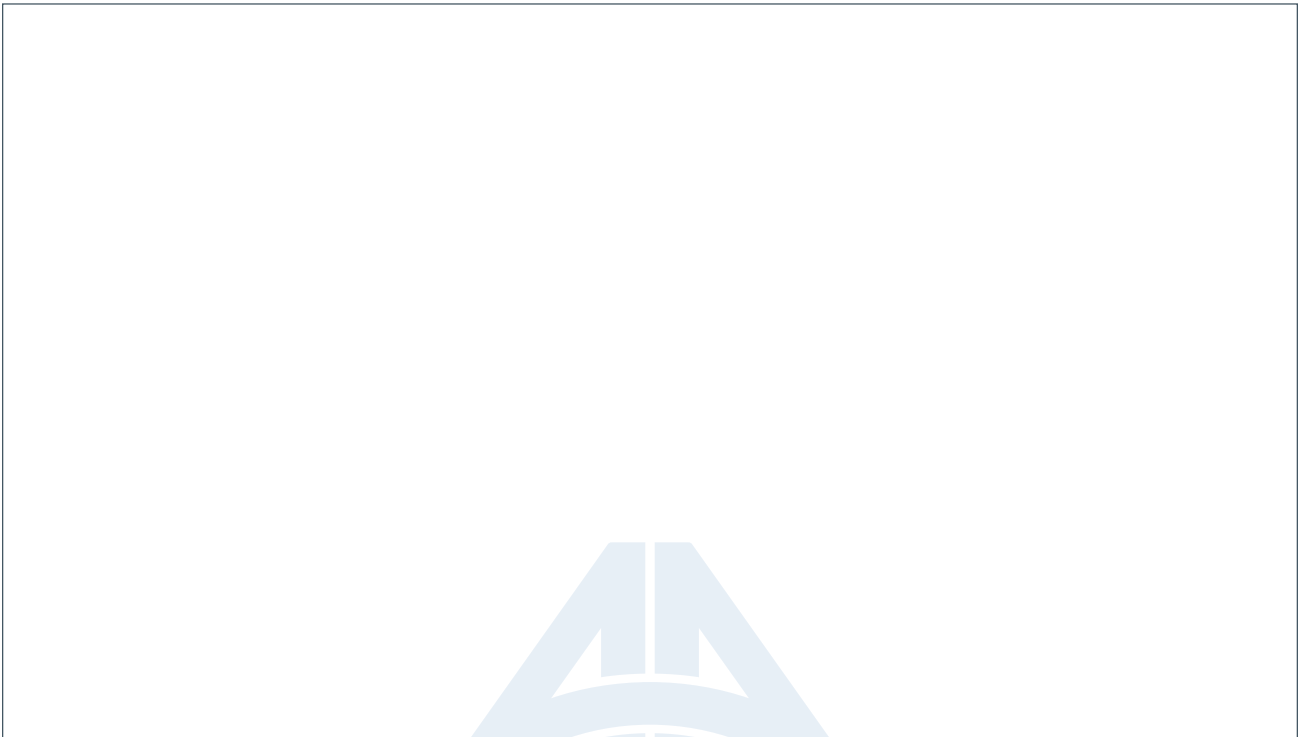
⁴ The possibilities are:

- Subordinate/reports to: The sexual or sexist conduct is exhibited by a direct superior (immediate boss) or indirect superior (of a higher rank, even if they do not work with you directly).
- Same rank: The sexual or sexist conduct is exhibited by worker of the same level or category as you.
- Lower rank: The sexual or sexist conduct is exhibited by a worker whose level is lower than the one which you hold.
- Unrelated: The sexual or sexist conduct is exhibited by a third party who does not work for the Company but who provides frequent/occasional services at the facilities, or with whom you must interact in the course of the services they provide.

* Additionally, any person who has knowledge of acts that may meet the definition of sexual harassment can file a complaint. In this case, indicate "N/A," since you are not directly involved in the incident.

I. Description of the events:

Below is a description of the events⁵:

**II. Evidence:**

As proof of the foregoing, I am attaching and furnishing the following evidence⁶:

- a)
- b)
- c)

⁵ If necessary, you can request additional space to provide a detailed and precise narration of all the situations related to your complaint. Please be sure to fully detail aspects such as: (i) conduct/terms used that may justify your complaint; (ii) the means through which they were performed (in person, email, phone call, text messages, etc.); (iii) spaces in which they occurred (inside the company/outside the company); and (iv) any other information of interest.

If you were not the person directly affected, indicate how you became aware of the events as clearly and precisely as possible.

⁶ Acceptable forms of evidence include, but are not limited to: ex parte testimony, public or private documents, written witness statements, recordings, emails, text messages, photographs, objects, psychologists' reports, medical reports, etc. Remember that this point is not obligatory.

III. Protective Measures:

I have been duly informed by my employer regarding the possibility of being granted the following protective measures, which I am hereby requesting for evaluation⁷:

- a)
- b)
- c)

In light of the foregoing, I DO HEREBY REQUEST the processing of this COMPLAINT in accordance with the procedure established in the Sexual Harassment Prevention and Punishment Act – Law 27942, its Regulations as approved by Executive Order (Decreto Supremo) 014-2019-MIMP, and the Internal Policy of the Company.



⁷ Rotation or change of the accused's work area.

- Temporary suspension of the accused.

- Rotation or change of my work area.

- Filing of a request with the competent authority for a restraining order barring the accused from approaching the victim or his or her family or communicating with the victim in any way.

o Any others you may deem appropriate for me or my witnesses.

* In the event that you, as the reporting party, are not directly affected by the events in question, you can skip this section.

2. SEXUAL HARASSMENT COMMITTEE REPORT FORM

Having been notified on _____ of the complaint, grievance, or notification of sexual harassment filed by _____ regarding the events set forth in the following section, and having conducted the corresponding investigation and analysis of the available evidence, the Sexual Harassment Committee (hereinafter, the “CIHS” for its acronym in Spanish), within the corresponding time period, hereby proceeds to issue the following report:

I. Description of the Alleged Events

Summary description of the events reported by the victim, a third party, or the employer (in case of ex officio proceedings). This part shall contain the narration of events as set forth in the statements of the victim.

The description should be as objective as possible, without including value judgments.

II. Defense Arguments

In response to the events reported, on _____, the accused, _____, has declared as follows in response to the complaint filed against him/her:

Summary of the defense arguments offered by the person against whom the complaint has been filed. This part shall contain the narration of events as set forth in the statements of the accused. The description should be as objective as possible, without including value judgments.

If no defense arguments have been offered, indicate that despite being duly notified, the accused has chosen not to exercise his/her right to a defense.

III. Description and Evaluation of the Evidence

To prove their claims, both parties proceeded to provide the evidence they deemed relevant.

The CIHS has performed an internal evaluation, determining that the following evidence is suitable for an analysis of the case at hand:

List of evidence provided and the probative value assigned to each piece of evidence.

IV. Conclusion: Proposal of Disciplinary Measures or Closing of the Case

Taking into account the events reported, the defense arguments presented, and the evidence provided, the CIHS has reached the following conclusions:

Details on the conclusions reached by the Committee regarding the events reported. The options are: (i) the complaint of sexual harassment is hereby declared WELL-FOUNDED; (ii) the complaint of sexual harassment is hereby DISMISSED.

This point shall also include details on the proposed disciplinary measures, where applicable.

ANNEX 1

**FORM FOR THE PROCESSING OF COMPLAINTS AND/OR GRIEVANCES REGARDING
SEXUAL HARASSMENT AT CORPORACION ACEROS AREQUIPA S.A.**

I, (full name),
identified with (ID document), with residence at
.....
....., do hereby appear before you for the purpose of placing on
record a Complaint against
....., regarding the events
detailed herein below:

.....
.....
.....
.....
.....
.....
.....
.....
.....
.....



(Provide a clear and orderly explanation of the events, the time, place, and form in which they can be verified, the alleged perpetrators and participants, and any evidence or description thereof, as well as anything else that may be useful in verifying the events.)

EVIDENCE:

Indicate the evidence being offered for each particular case.

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.

IN THE EVENT THAT I DO NOT HAVE THE PHYSICAL EVIDENCE, I hereby swear that the authority of ... have it in their possession, as follows:

.....

.....

.....

.....

.....

.....

.....

I HEREBY REQUEST PROTECTIVE MEASURES

Lima, (day) (month) 20

(signature of the reporting party)

Full Name:

Identity Document No.:

The following evidence may be submitted:

- Witness statements.
- Public and/or private documents.
- Audio recordings, emails, videos, text messages, photographs, objects, or other similar items.
- Reports from psychologists, forensic psychiatrists, handwriting experts, biological and chemical analyses, etc.
- Any other suitable evidence that may allow for the verification of the acts of sexual harassment being reported.

