

**PREPARED BY:**  
Mining and Projects Management  
Assistant Social Responsibility Management

**REVIEWED BY:**  
CEO  
Executive Chairman Office  
Audit and Risk Committee

**APPROVED BY:**  
Board of Directors

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# CORPORATE HUMAN RIGHTS AND DIVERSITY POLICY

## 1. OBJECTIVE

Declare respect for human rights in all of the activities and operations of Corporation Aceros Arequipa S.A. (hereinafter, “CAASA”), as well as in its relationships with shareholders, team members, partners, clients, suppliers, and communities.

## 2. SCOPE

This policy applies to all members of CAASA, including directors, senior executives, and team members in general. As such, it applies to all of Corporation’s subsidiaries and affiliates, regardless of the region or country where they operate.

This policy also applies to suppliers, contractors, and business partners with whom CAASA has a business relationship.

## 3. JUSTIFICATION

As established in the Corporation’s Code of Ethics and Corporate Social Responsibility Policy, CAASA has an explicit commitment to respect human rights that lays the foundation on which to build trust-based relationships with its stakeholders and create value on a sustainable basis.

This policy strengthens and deepens already established commitments, incorporates standard international principles, and facilitates the understanding and application of effective preventive measures.

#### 4. RESPONSIBILITIES

LEVELS OF RESPONSIBILITY	RESPONSIBLE PARTIES
Responsible for implementation and maintenance:	Human Resources Management Mining and Projects Management Assistant Social Responsibility Management
Responsible for execution:	All managements
Responsible for verification:	CEO

#### 5. REFERENCE LEGAL FRAMEWORK

CAASA complies with all laws in force in Peru. This policy was drafted in accordance with the United Nations Universal Declaration on Human Rights and Guiding Principles on Business and Human Rights.

It is also related to the following internal policies:

- Code of Ethics
- Supplier Code of Conduct
- Anti-Fraud and Corruption Code
- Aceros Arequipa Ethical Line
- Corporate Social Responsibility Policy
- Corporate Human Resources Management Policy
- Corporate Environmental Policy
- Corporate Occupational Health and Safety Policy

## 6. DEFINITIONS

- **Human rights:** Rights inherent to all human beings, including the right to life and liberty; the right not to be subjected to slavery or torture; freedom of expression; the right to education and work, and others.
- **Discrimination:** Involves treating team members or third parties in a way that is different, arbitrary, or that affects their equal opportunities based on race, color, gender, religion, political opinion, social background, and economic level.
- **Stakeholders:** All persons or groups of persons who form part of a company's environment, and who may be affected, whether positively or negatively, by a company's decisions and objectives.
- **Harassment:** To disturb or bother someone, affecting the normal course of their everyday life.
- **Forced work:** All work or service demanded of an individual under threat of psychological, physical, or material punishment, for which said individual does not voluntarily offer him/herself<sup>1</sup>.
- **Human Trafficking:** It refers to trade of individuals or the illegal movement of human beings for the purpose of labor, mental or sexual slavery and any form of work against the will and well-being of the human being.

## 7. CONDUCT GUIDELINES

CAASA declares to respect human rights in both its operations and its business activities, as well as its stakeholder relations. As part of this commitment:

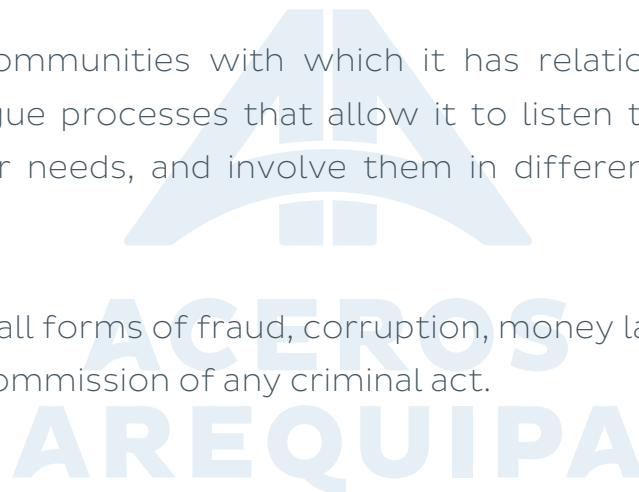
- It establishes procedures that enable it to identify, prevent, and mitigate risks to and/or possible impacts on human rights. It also has mechanisms for stakeholders to file complaints and grievances, such as the Ethics Hotline.

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<sup>1</sup>See Article 2.1 of ILO Convention 29.

- It encourages its business partners, suppliers, and contractors, including those responsible for its security operations, to familiarize themselves with, adhere to, and comply with the action principles set forth in this policy and the Supplier Code of Conduct.
- It promotes a positive, respectful and violence-free work environment. As such, it firmly rejects all types of discrimination, harassment, abuse of authority, and violence, whether physical, verbal, psychological or cybernetic, as well as any other conduct that may affect people's honor.
- It strongly rejects and strives to eliminate all forms of child labor.
- It strongly rejects forced labor, slavery and human trafficking. It is not allowed to retain the identity documents of our collaborators or contractors, to apply non-consensual discounts or carry out intimidating practices that could restrict people's freedom of movement or their right to change jobs.
- It complies with applicable labor laws and ensures decent working conditions that consider aspects such as the length of the working day, respect for rest periods and vacations, the payment of fair remuneration in accordance with industry standards, the experience of the collaborator and the responsibility of the position, as well as the corresponding social benefits.
- It recognizes and respects the right of its team members and contractors to freedom of association and collective bargaining, under the legal framework and standards in force.
- It guarantees diversity and equal opportunities in its work and strives to ensure that its governing bodies and the different levels of the organization consist of people of different genders, race, age, geographic origin, capacities, and other factors, placing a continuous priority on transparency and merit in its selection processes.

- It guarantees safe and healthy working conditions for its team members, contractors, and the communities in its area of influence. For such purpose, it promotes a culture of prevention at all levels of the company, periodically evaluates its risks, and establishes effective measures of control and mitigation.
- It complies with environmental legislation and has all the permits and licenses to operate. It protects the environment and biodiversity where it operates and strives to avoid, reduce, and/or mitigate the negative impacts of its activities, based on a risk prevention and management approach to environmental risks.
- It commits to not deforest new forests and to compensate for any impact with reforestation plans that are proportionate and reasonable to the damage generated.
- It respects the communities with which it has relationships and promotes transparent dialogue processes that allow it to listen to them, provide clear responses to their needs, and involve them in different social development initiatives.
- It strongly rejects all forms of fraud, corruption, money laundering, financing of terrorism or the commission of any criminal act.



## 8. COMPLIANCE

CAASA's Ethics Hotlines is available to its stakeholders (internal and external) so that they can report any concerns or potential violations of the Human Rights Policy or any of the company's other internal policies, through the following channels:

- Website: Virtual Form: [www.lineaeticaacerosarequipa.com](http://www.lineaeticaacerosarequipa.com)
- E-mail: [denuncias@lineaeticaacerosarequipa.com](mailto:denuncias@lineaeticaacerosarequipa.com)
- Phone line: Available 24 hrs., 7 days a week.
  - +51-1-0800-18-134 (No charge).
  - +51-1-219-7134 (Local call cost).
- WhatsApp: You can contact an independent company advisor from Monday to Friday from 8:30 a.m. at 6:30 p.m. to the following number: (+51)989-043-514.

We guarantee that all reports will be treated confidentially and will be investigated in a professional and objective manner, ensuring that no retaliation will occur.

## 9. SANCTIONS

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

## 10. TERM

This corporate Policy will be reviewed and updated when the responsible management identifies any substantial change in its content. This Policy was approved in a Board meeting on August 7, 2020 and amended on May 27, 2021, and is effective from the date of its approval.