

Report on compliance with the code of good corporate governance for peruvian companies (100150)

Company name:

CORPORACION ACEROS AREQUIPA S.A.

FISCAL YEAR:

2021

WEB SITE:

www.acerosarequipa.com



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The Board of Directors, the CEO, and the Senior Management have implemented Corporate Codes and Policies for good business management, these implementations have allowed us to face adverse situations such as the results of the pandemic and to take responsible actions to maintain the operations, focusing on health and safety of our employees and suppliers.

Furthermore, the company has created new behavior and biosecurity mandatory compliance health protocols to watch over the health of our employees, suppliers, customers, and consequently their families.

The Board of Directors, the CEO, and the Senior Management are aware that the guidelines of Good Corporate Governance are fundamental to achieving corporate goals and creating value for our stakeholders.

The Audit and Risk Committee promotes the definition, implementation, and compliance of management guidelines included in the Corporate Policies and Codes to maintain and strengthen the company's internal control system and guide the ethical behavior of our employees so that they can achieve business goals. These guidelines define criteria and establish an action framework that guides business management in specific aspects for all of our employees. Furthermore, when these documents are approved by the Board of Directors, they become non-negotiable behavior guidelines and mandatory compliance.

In 2021, the Board of Directors approved the review of the following Corporate Policies: a) Corporate Environmental Policy and b) Corporate Human Rights Policy; and the Code of Ethics for Suppliers.

The company is committed to the fight against bribery, fraud, and corruption, thus the Board of Directors and the Senior Management have implemented a Prevention Model, which establishes an exemption of responsibility of the Company's management in the case of related crimes according to Law. The Audit and Risk Committee reviews the business plan of the person in charge of prevention and supervises it, informing the Board of Directors when necessary. The Company's Code against Acts of Fraud and Corruption defines the policies and guidelines against acts of fraud and corruption, money laundering, and terrorism financing.

Moreover, the Company and its subsidiaries manage their actions within an Ethical Culture based on values, the Code of Ethics, and the Code Against Acts of Fraud and Corruption. Since May 2017, the Company has implemented Aceros Arequipa Ethics Hotline. Through this communication channel, employees, customers, and suppliers can anonymously and confidentially report irregularities or situations that go against the values and the Code of Ethics of Aceros Arequipa and its subsidiary companies.

During the fiscal year 2021, the Audit and Risk Committee has done important work to guarantee the independence of the external auditor of the financial statements of the Company and its subsidiaries and the review of these documents before being presented to the Board of Directors and the Mandatory Annual Shareholders' Meeting for final approval. The Committee also monitors the independence of the Internal Audit Function and the No Conflict of Interest in its duties.

It is important to mention that the Company, considering its duty as an employer, is responsible for full, timely, and adequate fulfillment of all its labor obligations, as well as for achieving efficient and safe management of the Company's workforce, guaranteeing life care, health and well-being of our employees, while promoting maximum productivity in the organization.

Lima. Av. Antonio Miró Quesada N° 425, Piso 17, Magdalena del Mar, Lima 17 - Perú.

Arequipa. Variante de Uchumayo Km. 5.5, Cerro Colorado, Arequipa.

Pisco. Carretera Panamericana Sur Km. 241, Paracas. Pisco - Ica.

Central telefónica: (51-01) 517 1800

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**LA SEGURIDAD
DE UN FIERRAZO**



In 2021 the Appointments, Remuneration, and Human Resources Committee, which is fully committed to ensuring equity and competitiveness in human resources management, was appointed responsible for reviewing and approving the results of the management objectives of 2020; carrying out the validation of the assignment of management objectives of 2021; monitor the evolution of Headcount, Labor Cost and Productivity indicators, review the progress of the Collective Bargaining process, Salary Increases, Labor Lawsuits, COVID-19 cases; and evaluating the evolution of the Long-Term Managerial Bonus Scheme for the retention of executives in critical positions for the Company.

Finally, it should be noted that in December 2021, after completing the application of the Trust Index survey and the Culture Audit study carried out by Great Place to Work Peru, the Company obtained the GPTW Certification for the period 2021–2022 as a recognition of the Company for offering its employees a work experience with top business world standards.

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SECTION B:

EVALUATION OF COMPLIANCE WITH THE PRINCIPLES OF THE CODE OF GOOD CORPORATE GOVERNANCE

PILLAR I - Right of Shareholders

PRINCIPLE 1: TREATMENT PARITY

Question I.1

	Yes	No	Explanation:
<i>Does the company recognize in its actions equal treatment for shareholders of the same class and who maintain the same conditions (*)?</i>	X		

(*) The same conditions are understood to be those particularities that distinguish shareholders, or make them have a common characteristic in their relationship with the company (institutional investors, non-controlling investors, etc.). It should be noted that this does not imply that the use of privileged information is favored.

Question I.2

	Yes	No	Explanation:
<i>Does the company promote the existence of only voting shares?</i>	X		

a. About the capital of the company, specify:

CAPITAL SUBSCRIBED AT THE END OF THE FISCAL YEAR	CAPITAL PAID-UP AT THE END OF THE FISCAL YEAR	TOTAL NUMBER OF SHARES REPRESENTING THE CAPITAL	NUMBER OF VOTING SHARES
S/890,858,308	S/890,858,308	890,858,308	890,858,308

b. If the company has more than one class of share, specify:

TYPE	NUMBER OF SHARES	NOMINAL VALUE	RIGHTS(*)
COMMON	890,858,308	S/1.00	RIGHT TO VOTE

(*) This field must indicate the particular rights of the class which distinguish it from the others.

Question I.3

	Yes	No	Explanation:
<i>If the company has investment shares, does the company promote a policy of redemption or voluntary exchange of investment shares for common shares?</i>		X	THE COMPANY CONTINUALLY EVALUATES THESE OPTIONS, AT THIS TIME, WE DO NOT HAVE SUCH A POLICY. THE COMPANY IS GOING THROUGH AN INVESTMENT PERIOD AND A REDEMPTION WOULD REQUIRE ADDITIONAL FUNDS.

PRINCIPLE 2: SHAREHOLDING

Question I.4

	Yes	No	Explanation:
<i>a. Does the company establish in its corporate documents the form of representation of the shares and the person responsible for registration in the stock record?</i>	X		THE FORM OF REPRESENTATION OF THE SHARES IS INDICATED IN THE BYLAWS, WHICH ARE AVAILABLE ON THE COMPANY'S WEBSITE.
<i>b. Is the stock record permanently updated?</i>	X		

Indicate the periodicity with which the stock record is updated, after being informed about any change.

Periodicity:	Within forty-eight hours	
	Weekly	X
	Other / Detail (in days)	

PRINCIPLE 3: NON-DILUTION IN EQUITY INTEREST

Question I.5

	Yes	No	Explanation:
<i>a. Does the company have a policy where the proposals of the Board of Directors referring to corporate operations that may affect the right of non-dilution of the shareholders (i.e., mergers, spin-offs, capital increases, among others) are previously explained by said body in a detailed report with the independent opinion of an external advisor of recognized professional trustworthiness appointed by the Board of Directors?</i>	X		WITHIN THE BOARD OF DIRECTOR'S REGULATIONS, AND TO DATE, THERE HAVE BEEN NO CORPORATE OPERATIONS MENTIONED IN THE QUESTION.
<i>b. Does the company have a policy of making these reports available to shareholders?</i>	X		THE BOARD OF DIRECTOR'S REGULATIONS

If the company has carried out corporate operations during the fiscal year under the scope of subparagraph a) of question I.5, and if the company has Independent Directors (*), specify whether in all cases:

	Yes	No
Did all the Independent Directors vote in favor of the appointment of the external advisor?		
Did all the Independent Directors clearly express their acceptance of the referred report and give reasons, if any, for their disagreement?		

(*) Independent directors are those who qualify as such in accordance with the Guidelines for the Classification of Independent Directors, as approved by the Peruvian Securities and Exchange Commission.

PRINCIPLE 4: INFORMATION AND COMMUNICATION TO SHAREHOLDERS

Question I.6

	Yes	No	Explanation:
<i>Does the company define who is responsible for the information sent to the shareholders or the channels in which the shareholders will receive timely, reliable and truthful information?</i>	X		YES. THE COMPANY HAS A SHAREHOLDER SERVICE AREA, WHICH HAS THE FOLLOWING E-MAIL: accionistas@aasa.com.pe. THE COMPANY USES: WEBSITE FOR INVESTORS WHERE RELEVANT INFORMATION IS GIVEN (https://investors.acerosarequipa.com). ALSO IN THE QUARTERLY RESULTS (TELEPHONE AND/OR WEBSITE), MAILING LIST, ETC.

a. Indicate the means by which shareholders receive and/or request information from the company.

MEDIA	RECEIVE INFORMATION	REQUEST INFORMATION
E-mail address	X	X
Telephone	X	X
Corporate website	X	X
Post	X	X
Briefings	X	X
Other / Detail	IMPORTANT FACTS	

b. Does the company have a deadline for responding to requests for information submitted by shareholders? If yes, specify the deadline:

MAXIMUM PERIOD (DAYS)	3
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Question I.7

	Yes	No	Explanation:
<i>Does the company have mechanisms for shareholders to express their opinion on the development of the company?</i>	X		SHAREHOLDERS CAN EXPRESS THEIR OPINION AT THE SHAREHOLDERS' MEETING, THROUGH THE COMPANY'S COMMUNICATIONS CHANNELS, AND DURING QUARTERLY RESULTS CONFERENCE CALL PRESENTATIONS.

If yes, please provide details on the mechanisms established by the Company to allow shareholders to express their opinions on its performance.

THE SAME CHANNELS DETAILED IN POINT I.6. A.

PRINCIPLE 5: DIVIDENDS OF THE COMPANY

Question I.8

	Yes	No	Explanation:
a. Is compliance with the dividend policy subject to scheduled evaluations?	X		
b. Is the dividend policy communicated to shareholders, among other media, through its corporate website?	X		

a. Indicate the company's dividend policy applicable to the fiscal year.

Date of approval	28/03/2016
Dividend policy (criteria for distribution of profits)	<p>The Company will apply the profits to cash dividends, after the statutory reserves have been made and those that may, at the proposal of the Board of Directors, be necessary for the company's operations. The proportion of profits to be distributed annually as cash dividends will be 40% of the freely distributable profit for the year.</p> <p>The Board of Directors may approve two interim cash dividend advances during the current fiscal year at any time as follows:</p> <ul style="list-style-type: none"> - For an amount equivalent to up to 10% of the projected freely distributable profit for the current fiscal year, together with the approval of the interim financial statements as of June 30 of every year. - For an amount equivalent to 24% of the projected freely distributable profit for the current fiscal year, less the first advance dividend, together with the approval of the interim financial statements as of September 30 of every year. <p>The payment of the dividend up to an amount equivalent to 40% of the freely distributable profit for the year, less advances made, will be put for consideration at the mandatory annual shareholders' meeting to be held within the first quarter of the next year.</p> <p>The approval of cash dividend advances, the balance of the annual dividend, and the amounts for which they are made, will be subject to liquidity, indebtedness and cash flow of the company, as well as compliance with the covenants established in the financing contracts signed by the company.</p> <p>Exceptionally, the Board of Directors may, if it deems convenient, approve an additional dividend, with the obligation to support the decision made before the shareholders' meeting. The distribution of shares fully paid-up by the capitalization of profits will be evaluated by the shareholders' meeting at the proposal of the Board of Directors, either at the mandatory annual shareholders' meeting or at any other shareholders' meeting called for such purpose.</p>

b. Indicate the dividends in cash and shares distributed by the company in this fiscal year and in the previous one.

Per share	DIVIDENDS PER SHARE			
	REPORTING FISCAL YEAR		FISCAL YEAR PRIOR TO THE REPORTING FISCAL	
	IN CASH	IN SHARES	IN CASH	IN SHARES
Class: Common and investment	0.307726449		0.069805633	
Class				
Investment Share				

PRINCIPLE 6: CHANGE OF CONTROL OR TAKEOVER

Question I.9

	Yes	No	Explanation:
<i>Does the company have policies or agreements not to adopt antiabsorption mechanisms?</i>		X	THE COMPANY DOES NOT HAVE THE CITED POLICIES AND THERE HAVE BEEN NO CASES IN THE PAST.

Indicate whether your company has applied any of the following measures:

	Yes	No
Requirement of a minimum number of shares to be a Director		X
Minimum number of years as Director to be appointed as Chairman of the Board of Directors		X
Executives/officials compensation agreements as a result of changes following a Takeover		X
Others of a similar nature/ Detail		

PRINCIPLE 7: ARBITRATION FOR THE SETTLEMENT OF DISPUTES

Question I.10

	Yes	No	Explanation:
<i>a. Does the company’s bylaws include an arbitration agreement that recognizes that any dispute among shareholders, or between the shareholders and the Board of Directors, should be submitted to arbitration in law; as well as the challenge of resolutions of the Shareholders’ Meeting and the Board of Directors by the shareholders of the company?</i>	X		YES, ACCORDING TO ARTICLE 74 OF THE BYLAWS.
<i>b. Does this clause make it easier for an independent third party to settle disputes, except in the case of an express statutory reserve before the provincial courts?</i>	X		YES, THE THIRD PARTY BEING AN ARBITRATION COURT.

If the resolutions of the Shareholders’ Meeting and the Board of Directors have been challenged by the shareholders or others involving the company during the fiscal year, specify their number.

Number of challenges of resolutions of the Shareholders’ Meeting	0
Number of challenges of resolutions of the Board of Directors	0

PILLAR II - Stakeholders' Meeting

PRINCIPLE 8: FUNCTION AND COMPETENCE

Question II.1

	Yes	No	Explanation:
<i>Is the approval of the remuneration policy of the Board of Directors an exclusive and nondelegable function of the Shareholders' Meeting?</i>	X		IT IS CONSIDERED IN THE BYLAWS OF THE COMPANY, WHICH IS APPROVED BY THE SHAREHOLDERS' MEETING.

Indicate whether the following functions are exclusive to the Shareholders' Meeting; in the event of a negative answer, specify the body that exercises them.

	Yes	No	Body
Arrange special investigations and audits		X	SHAREHOLDERS' MEETING FUNCTION. SHARED WITH THE BOARD OF DIRECTORS WITHIN THE AUDIT AND RISK COMMITTEE.
Agree on amendments to the Bylaws	X		
Agree on an increase in capital stock	X		
Agree on the distribution of interim dividends		X	SHAREHOLDERS' MEETING FUNCTION. SHARED WITH THE BOARD OF DIRECTORS, ACCORDING TO THE DIVIDEND POLICY.
Appoint external auditors		X	SHAREHOLDERS' MEETING, UNLESS EXPRESSLY DELEGATED TO THE BOARD OF DIRECTORS.

PRINCIPLE 9: REGULATIONS OF THE SHAREHOLDERS' MEETING

Question II.2

	Yes	No	Explanation:
<i>Does the company have a Regulation for the Shareholders' Meeting, which is binding in nature and does non-compliance entail liability?</i>	X		

If Regulations of the Shareholders' Meeting are in place, please specify whether they set the procedures for:

	Yes	No
Call to the shareholders' meeting	X	
Incorporate agenda topics by shareholders	X	
Provide additional information to shareholders for the Shareholders' Meetings	X	
Development of the Shareholders' Meetings	X	
Appointment of members of the Board of Directors		X
Other relevant / Detail		

PRINCIPLE 10: MECHANISMS OF CALL TO MEETINGS

Question II.3

	Yes	No	Explanation:
<i>In addition to the mechanisms of call to meetings established by law, does the company have other call meeting mechanisms that allow to establish contact with shareholders, particularly with those who do not participate in the control or management of the company?</i>	X		

a. Complete the following information for each of the Shareholders' Meetings held during the fiscal year:

CALL DATE OF MEETING	DATE OF SHAREHOLDERS' MEETING	LOCATION OF SHAREHOLDERS' MEETING	TYPE OF SHAREHOLDER'S MEETING		UNIVERSAL SHAREHOLDER'S MEETING		QUORUM %	NO. OF PARTICIPANT SHAREHOLDERS	PERCENTAGE (%) OF TOTAL VOTING SHARES		
			SPECIAL	GENERAL	Yes	No			THROUGH POWERS OF ATTORNEY	DIRECT EXERCISE (*)	DID NOT EXERCISE RIGHT TO VOTE
25/02/2021	26/03/2021	ZOOM platform		X			84	24	58	26	
03/05/2021	14/05/2021	ZOOM platform		X			81	24	56	24	
26/08/2021	06/09/2021	ZOOM platform		X			82	19	62	20	

(*) Direct exercise includes voting by any means or modality that does not imply representation.

b. What means, in addition to what is included in Article 43 of the General Law of Companies and the Regulations on Important Facts and Confidential Information, did the company use to disseminate the call to meetings to the Shareholders' Meetings during the fiscal year?

E-mail	x	Post	
Telephone		Social networks	
Corporate website	x	Other / Detail	

Question II.4

	Yes	No	Explanation:
<i>Does the company provide all the information related to the topics of the agenda of the Shareholders' Meeting and the proposals of resolutions to be adopted (motions) to the shareholders?</i>	X		

In the call to meeting made by the company during the fiscal year:

	Yes	No
Was the location of the information referring to the agenda topics to be discussed at the Shareholders' Meetings specified?	X	
Were the following topics included in the agenda: "other subjects", "various topics" or similar?		X

PRINCIPLE 11: PROPOSALS FOR AGENDA TOPICS

Question II.5

	Yes	No	Explanation:
<i>Does the Regulations of the General Shareholders' Meeting include mechanisms that allow shareholders to exercise the right to make proposals for agenda topics to be discussed at the Shareholders' Meeting and the procedures for accepting or rejecting such proposals?</i>	X		

a. Indicate the number of proposals submitted by the Shareholders during the fiscal year to be included as agenda topics to be discussed in the Shareholder's Meeting and how these topics were solved.

NUMBER OF PROPOSALS		
RECEIVED	ACCEPTED	Denegadas
0	0	0

b. If requests for agenda topics to be discussed at the Shareholders' Meeting were rejected during the fiscal year, indicate whether the company communicated the grounds for rejection to the requesting shareholders.

Yes

No

PRINCIPLE 12: VOTING PROCEDURES

Question II.6

	Yes	No	Explanation:
<i>Does the company have mechanisms that allow remote voting to shareholders through safe, electronic or postal means that guarantee the person voting is the correct shareholder?</i>		X	DURING FISCAL YEAR 2021, THE GENERAL SHAREHOLDERS' MEETING WAS HELD VIRTUALLY THROUGH ZOOM PLATFORM. USING THE ZOOM PLATFORM TOOLS, VOTES WERE RECORDED FOR EACH AGENDA ITEM. IN ADDITION, SEVERAL PROCEDURES WERE CARRIED OUT TO AUTHENTICATE THE SHAREHOLDERS, WHICH ARE DETAILED IN THE INFORMATIVE DOCUMENT ATTACHED TO THE CALL TO MEETING.

a. If so, indicate the mechanisms or means that the company has to exercise remote voting.

VOTE BY ELECTRONIC MEANS	X	VOTE BY POSTAL MEANS	
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b. If remote voting was used during the fiscal year, provide the following information:

DATE OF THE SHAREHOLDER S' MEETING	% REMOTE VOTING				% REMOTE VOTING / TOTAL
	E-MAIL	CORPORATE WEBSITE	POST	OTHER	
26/03/2021				100	100
14/05/2021				100	100
06/09/2021				100	100

Question II.7

	Yes	No	Explanation:
<i>Does the company have corporate documents that clearly specify that shareholders can vote separately on matters that are materially independent, so that they can exercise their voting preferences separately?</i>	X		

Indicate whether the company has corporate documents that clearly specify that shareholders can vote separately for:

	Yes	No
Appointment or ratification of Directors by individual vote by each of them.		X
The amendment to the Bylaws, for each article or group of articles that are substantially independent.		X
Other/ Detail		

Question II.8

	Yes	No	Explanation:

<i>Does the company allow those who act on behalf of several shareholders to vote different for each shareholder, so that they comply with the instructions of each represented party?</i>	X		
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PRINCIPLE 13: PROXY VOTE

Question II.9

	Yes	No	Explanation:
Does the company's Bylaws allow its shareholders to delegate their vote in favor of any person?	X		

If the answer is no, indicate if your Bylaws restrict the right of representation in favor of any of the following persons:

	Yes	No
Another shareholder		
A Director		
A Manager		

Question II.10

	Yes	No	Explanation:
a. Does the company have procedures detailing the conditions, means and formalities to be complied with in situations of proxy vote?	X		IT IS REGULATED IN THE COMPANY'S BYLAWS, IN ACCORDANCE WITH ARTICLE 37.
b. Does the company provide shareholders with a model letter of representation, including data of the representatives, the matters for which the shareholder delegates its vote, and if so, the direction of its vote for each of the proposals?	X		IT IS ANNEXED IN THE CALL TO THE SHAREHOLDERS' MEETING

Indicate the requirements and formalities demanded for a shareholder to be represented at a Shareholders' Meeting:

Formality (indicate if the company requires a non-notarized letter, notarized letter, title deed or other).	NON-NOTARIZED LETTER
Advance (number of days prior to the Shareholders' Meeting with which the power of attorney must be submitted).	24 HOURS
Cost (indicate if there is a required payment for proxy votes and if applicable its cost)	NO COST

Question II.11

	Yes	No	Explanation:
a. Does the company have a policy of establishing limitations on the percentage of proxy votes in favor of the members of the Board of Directors or Senior Management?		X	THERE ARE NO LIMITATIONS (IT IS NOT REGULATED) BECAUSE IT IS CONSIDERED A RIGHT OF THE SHAREHOLDER TO FREELY CHOOSE TO WHOM TO DELEGATE HIS OR HER VOTES

<i>b. In the case of proxy voting in favor of members of the Board of Directors or Senior Management, does the company have a policy that the shareholders who delegate their votes clearly establish their direction?</i>	X		
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PRINCIPLE 14: FOLLOW UP OF AGREEMENTS OF THE SHAREHOLDERS' MEETING

Question II.12

	Yes	No	Explanation:
<i>a. Does the company monitor the resolutions adopted by the Shareholders' Meetings?</i>	X		IT IS REGULATED IN ACCORDANCE WITH ARTICLE 23 IN REGULATIONS OF THE SHAREHOLDERS' MEETING.
<i>b. Does the company issue regular reports to the Board of Directors and are they available to shareholders?</i>	X		THE COMPANY REGULARLY SUBMITS REPORTS TO THE BOARD OF DIRECTORS AND, WHEN NECESSARY COMMUNICATES THEM TO THE SHAREHOLDERS.

If so, indicate the area and/or person in charge of following up on the resolutions adopted by the Shareholders' Meeting. If a person is in charge, include additionally his/her position and work area.

Area in charge	GENERAL MANAGEMENT
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PERSON IN CHARGE		
FULL NAME	POSITION	AREA
TULIO ALEJANDRO SILGADO CONSIGLIERI	CEO	GENERAL MANAGEMENT

PILLAR III - Board of Directors and Senior Management

PRINCIPLE 15: ESTABLISHMENT OF THE BOARD OF DIRECTORS

Question III.1

	Yes	No	Explanation:
<i>Is the Board of Directors composed of people with different specialties and competencies, with prestige, ethics, economic independence, sufficient availability and other qualities relevant to the company, so that there is a plurality of approaches and opinions?</i>	X		

a. Provide the following information corresponding to the members of the company's Board of Directors during the fiscal year.

FULL NAME	PROFESSIONAL TRAINING (*)	DATE		SHARES (****)	
		STAR (**)	END (***)	N° OF SHARES	SHARES (%)
DIRECTORS (EXCLUDING INDEPENDENT DIRECTORS)					
RICARDO CILLONIZ CHAMPIN	CIVIL ENGINEER WITH A MASTER'S DEGREE IN BUSINESS ADMINISTRATION.	24/03/2010			
	He is also Director of Rímac-Internacional Cía. de Seguros y Reaseguros and Celepsa S.A., companies that are not part of the Economic Group.				
JOSE ANTONIO BAERTL MONTORI	BACHELOR IN AGRICULTURAL SCIENCES	13/03/1998		44,659,256	5.01
ANDREAS VON WEDEMEYER KNIGGE	BUSINESS ADMINISTRATOR	24/03/2010			
	He is also Director at Corporación Cervesur S.A.A. and the companies that compose that economic group, Euromotors, Altos Andes, Euro Camiones, Euroinmuebles, EuroRenting, International Camiones del Perú S.A., Ferreycorp S.A.A., Ferreyros S.A., Alianza Compañía de Seguros y Reaseguros, Alianza Vida Seguros y Reaseguros (Bolivia), CFI Holdings S.A., La Positiva Seguros y Reaseguros, La Positiva Vida Seguros y Reaseguros, La Positiva Entidad Prestadora de SaludEPS, companies that are not part of the Economic Group.				
RENEE CILLONIZ DE BUSTAMANTE	MERCHANT	22/07/2005		141,971,334	15.94

	She is also Director at Fundo San Fernando S.A.,C., a company that is not part of the Economic Group.				
PABLO PESCHIERA ALFARO	MECHANICAL ENGINEER, HOLDS A MBA AND IS BUSINESS CONSULTANT.	28/02/2008			
PEDRO BLAY HIDALGO	INDUSTRIAL ENGINEER, HOLDS A MBA AND A MASTER'S DEGREE IN INTERNATIONAL BUSINESS	28/03/2016			
	He is also Director at Inmobiliaria Comercial del Acero Arequipa S.A. and Inmobiliaria Comercial del Acero Cajamarquilla S.A., companies that are part of the Economic Group.				
RICARDO BUSTAMANTE CILLONIZ	AGRICULTURAL ENGINEER	22/12/2011			
	He is also Director at Fundo San Fernando S.A. and Rethink Peru S.A.C. companies that are not part of the Economic Group.				
INDEPENDENT DIRECTORS					
MANUEL MONTORI BURBANK	LAWYER AND HOLDS A MBA	23/03/2017			
	He is also Director at Altozano Desarrollo y Construcción, a company that is not part of the Economic Group.				
FERNANDO CARBAJAL FERRAND	BUSINESS ADMINISTRATOR	13/03/1998			
	He is also Director at Plásticos Nacionales S.A., a company that is not part of the Economic Group.				
ENRIQUE OLAZABAL BRACESCO	LAWYER	13/03/1998			
DIEGO URQUIAGA HEINEBERG	ZOOTECNICIAN AND BUSINESS ADMINISTRATOR, BACHELOR OF ANIMAL SCIENCE AND MASTER OF BUSINESS ADMINISTRATION.	27/11/2003			
GISELLE FERRAND RUBINI	BUSINESS ADMINISTRATOR	25/04/2019			

(*) State in addition whether the Director participates simultaneously in other Boards of Directors, specify the number and whether these are part of the economic group of the reporting company. To this end, the definition of economic group contained in the Regulations on Indirect Ownership, Relationship and Economic Groups must be considered.

(**) Corresponds to the first appointment in the reporting company.

(***) Complete only if the person has left the position of Director during the fiscal year

(****) Mandatory only for Directors with an equity interest equal to or higher than 5% of the shares of the reporting company.

% OF TOTAL SHARES HELD BY DIRECTORS	24.78
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Indicate the number of Directors of the company in each of the following age ranges:

UNDER 35	BETWEEN 35 AND 55	BETWEEN 55 AND 65	OLDER THAN 65
0	4	2	6

b. Indicate if there are any specific requirements to be appointed Chairman of the Board of Directors in addition to those required to be appointed Director.

Yes No

If yes, indicate such requirements.

c. Does the Chairman of the Board of Directors have a casting vote?

Yes No

Question III.2

	Yes	No	Explanation:
<i>Does the company avoid the appointment of Alternate Directors, especially for quorum reasons?</i>	X		

If there are Alternate Directors, specify the following:

FULL NAME OF ALTERNATE DIRECTOR	STARTx (*)	END (**)

(*) Corresponds to the first appointment as Alternate Director in the reporting company
 (**) Complete only if the person has left the position of Alternate Director during the fiscal year.

PRINCIPLE 16: FUNCTIONS OF THE BOARD OF DIRECTORS

Question III.4

	Yes	No	Explanation:
<i>Are the following functions duties of the Board of Directors?</i>			
<i>a. To approve and direct the company's corporate strategy</i>	X		
<i>b. To set objectives, goals and action plans including annual budgets and business plans.</i>	X		
<i>c. To control and supervise the management and be in charge of the governance and administration of the company.</i>	X		
<i>d. To supervise good corporate governance practices and establish the necessary policies and measures to ensure its best application.</i>	X		

a. Detail what other relevant powers fall on the Board of Directors of the company.

MONITOR THE WHOLE COMPANY'S BUSINESSES; EVALUATE, APPROVE, DEFINE AND DIRECT THE STRATEGIC PLAN; ANALYZE AND MONITOR THE MARKET SITUATION; ESTABLISH THE INFORMATION POLICY BOTH INSIDE AND OUTSIDE THE COMPANY IN ORDER TO ENSURE TRANSPARENCY AND TIMELINESS WITH RESPECT TO THE INFORMATION PROVIDED TO THE MARKET WHILE SAFEGUARDING CONFIDENTIALITY WITH RESPECT TO THE COMPANY'S STRATEGIC OR SENSITIVE DATA OR INFORMATION; ENSURE COMPLIANCE WITH THE COMPANY'S CODE OF ETHICS AND APPROVE ITS CHANGES OR MODIFICATIONS, ETC.

b. Does the Board of Directors delegate any of its functions?

Yes No

Indicate, if applicable, which are the main functions of the Board of Directors that have been delegated, and the body that exercises them by delegation:

FUNCTIONS	BODY / AREA TO WHICH FUNTIONS HAVE BEEN

PRINCIPLE 17: DUTIES AND RIGHTS OF THE MEMBERS OF THE BOARD OF DIRECTORS

Question III.5

	Yes	No	Explanation:
<i>Do the members of the Board of Directors have the right to?:</i>			
<i>a. Ask the Board of Directors for expert counseling or support.</i>	X		
<i>b. Participate in induction programs regarding their powers and responsibilities and to be informed in a timely manner about the organizational structure of the company.</i>	X		
<i>c. Receive remuneration for the work carried out, which combines recognition of professional experience and commitment to the company with a rationality criteria.</i>	X		THE DIRECTORS EARN A REMUNERATION FOR THE WORK DONE. ACCORDING TO THE BY-LAWS OF THE COMPANY, THE REMUNERATION OF THE BOARD OF DIRECTORS IS SIX (6) PERCENT OF THE NET INCOME BEFORE TAXES AND AFTER DEDUCTION OF THE LEGAL RESERVE IN ACCORDANCE WITH THE LAW, IF APPLICABLE. AND MAY VARY ACCORDING TO THE ATTENDANCE AT EACH BOARD MEETING.

a. If specialized advisors were hired during the fiscal year, indicate whether the list of specialized advisors of the Board of Directors who provided services during the fiscal year for the decision-making of the company was communicated to the shareholders.

Yes No

If so, state whether any of the specialized advisors had any connection with any member of the Board of Directors and/or Senior Management (*).

Yes No

(*). For the purposes of relationship, the relationship criteria contained in the Regulations on Indirect Ownership, Relationship and Economic Groups will be applied

b. If so, state whether any of the specialized advisors had any connection with any member of the Board of Directors and/or Senior Management (*).

Yes No

c. Indicate the percentage represented by the total amount of remuneration and annual bonuses of Directors in relation to gross income, according to the financial statements of the company.

REMUNERATION	(%) GROSS INCOME	BONUSES	(%) GROSS INCOME
Directors (excluding Independent Directors)	0.69	Shares	
Independent Directors	0.49	Options	
		Cash	
		Other (detail)	NOT APPLICABLE.

PRINCIPLE 18: REGULATIONS OF THE BOARD OF DIRECTORS

Question III.6

	Yes	No	Explanation:
<i>Does the Regulation of the Board of Directors has a binding obligation and in which non-compliance entails a liability?</i>	X		

Indicate if the Regulations of the Board of Directors contains:

	Yes	No
Policies and procedures for its operation	X	
Organizational structure of the Board of Directors	X	
Functions and responsibilities of the Chairman of the Board of Directors	X	
Procedures for the identification, evaluation and nomination of candidates for the Board of Directors, who are proposed to the Shareholders' Meeting	X	
Procedures for vacancy, resignation and succession of Directors	X	
Other / Detail		

PRINCIPLE 19: INDEPENDENT DIRECTORS

Question III.7

	Yes	No	Explanation:
<i>Is the Board of Directors composed of at least one-third of Independent Directors?</i>	X		

In addition to those established in the “Guidelines for the Classification of Independent Directors,” the Company has set forth the following criteria for classifying its directors as independent:

THE COMPANY IS USING THE SAME CRITERIA VALID UP TO 2020.
IN ADDITION TO THOSE SET FORTH IN THE GOOD CORPORATE GOVERNANCE FORM OF 2020: SHARE OWNERSHIP OF LESS THAN 5% OF CAPITAL STOCK.

Question III.8

	Yes	No	Explanation:
<i>a. Does the Board of Directors state that the candidate it proposes is independent on the basis of its inquiries and the candidate’s statement?</i>	X		
<i>b. Do the candidates for Independent Directors state that they are independent before the company, its shareholders and directors?</i>	X		

Please indicate whether, at least once a year, the Board of Directors verifies that the Independent Directors meet the prerequisites and conditions to be classified as such.

Yes No

PRINCIPLE 20: EFFICIENCY OF THE BOARD OF DIRECTORS

Question III.9

	Yes	No	Explanation:
<i>Does the Board of Directors have a work plan that contributes to the efficiency of its functions?</i>	X		

Question III.10

	Yes	No	Explanation:
<i>Does the company provide its Directors with the necessary channels and procedures to enable them to participate effectively in the Board meetings, including in remote mode?</i>	X		

a. Indicate the following in relation to the meetings of the Board of Directors held during the fiscal year:

Number of meetings held	13
Number of meetings in which a call to meeting has not been used (*)	0
Number of meetings not attended by the Chairman of the Board of Directors	0
Number of meetings in which one or more Directors were represented by Alternate Directors	0
Number of Regular Directors who were represented at least once	0

(*) In this field, the number of meetings held under the last paragraph of Article 167 of the General Law of Companies must be reported.

b. Indicate the Board meetings attendance percentage of each Director during the fiscal year.

NAME	% OF ATTENDANCE
RICARDO CILLONIZ CHAMPIN	100
FERNANDO CARBAJAL FERRAND	100
PEDRO BLAY HIDALGO	100
JOSE ANTONIO BAERTL MONTORI	100
RICARDO BUSTAMANTE CILLONIZ	100
RENEE CILLONIZ CHAMPIN	100
ENRIQUE OLAZABAL BRACESCO	100
PABLO PESCHIERA ALFARO	100
DIEGO URQUIAGA HEINEBERG	100
GISELLE FERRAND RUBINI	100
ANDREAS VON WEDEMEYER KNIGGE	100
MANUEL MONTORI BURBANK	100

c. Indicate how far in advance to the Board meeting, all the information referring to the matters to be discussed in a meeting is available to the Directors.

	Less than 3 days	From 3 to 5 days	More than 5 days
Non-confidential information		X	
Confidential information		X	

Question III.11

	Yes	No	Explanation:
<i>a. Does the Board of Directors evaluate, at least once a year, objectively, its performance as a collegiate body and that of its members?</i>	X		
<i>b. Does the self-evaluation methodology alternate with the evaluation carried out by external advisors?</i>	X		ESTABLISHED IN THE BOARD OF DIRECTORS' REGULATIONS APPROVED IN NOVEMBER 2020.

a. Indicate whether any performance evaluations of the Board of Directors have been conducted during the fiscal year.

	Yes	No
As collegiate body	X	
To its members		X

If the answer to the previous question in any of the fields is yes, indicate the following information for each evaluation:

EVALUATION	SELF-EVALUATION		EXTERNAL EVALUATION		
	DATE	DISSEMINATION (*)	DATE	ENTITY IN CHARGE	DISSEMINATION (*)
SELF-EVALUATION	24/02/2022	NO			

(*) Indicate Yes or No, if the evaluation was informed to the shareholders

PRINCIPLE 21: SPECIAL COMMITTEES

Question III.12

	Yes	No	Explanation:
a. Does the Board of Directors of the company constitutes special committees focused on the analysis of those aspects most relevant to the company's performance?	X		
b. Does the Board of Directors approve the regulations that govern each of the special committees that it constitutes?	X		
c. Are the special committees chaired by Independent Directors?	X		ONLY THE APPOINTMENTS AND REMUNERATION COMMITTEE.
d. Does the special committees have an allocated budget?		X	NO, BECAUSE THEY DO NOT REQUIRE RECURRENT FUNDS. IN THE CASE THE COMMITTEES REQUIRE A BUDGET, THE COMMITTEE WILL REQUEST A SPECIFIC APPROVAL TO THE APPROPRIATE CORPORATE AUTHORITY. DURING 2021 THE ONLY COMMITTEE THAT HAD A BUDGET WAS THE SPECIAL COMMITTEE (NILO).

Question III.13

	Yes	No	Explanation:
Does the company have an Appointments and Remuneration Committee responsible for nominating candidates to the Board of Directors, who are proposed to the Shareholders' Meeting by the Board of Directors, and this committee is also responsible for approving the remuneration and incentives framework of Senior Management?	X		

Question III.14

	Yes	No	Explanation:
Does the company have an Audit Committee that supervises the effectiveness and suitability of the company's internal and external control system, the work of the audit company or the independent auditor, as well as compliance with the rules of legal and professional independence?	X		

a. Indicate whether the company also has the following Special Committees:

	Yes	No
Risk Committee	X	
Corporate Governance Committee		X

b. If the company has Special Committees, indicate the following information for each committee:

COMMITTEE 1	
Name of Committee:	AUDIT AND RISK COMMITTEE
Date of creation:	11/09/2012

Main duties:	<p>External Audit</p> <ol style="list-style-type: none"> 1. Assess the integrity of accounting systems through external audit. 2. Propose the external auditor to the Board of Directors. 3. Review and approve the external auditor's work plan. 4. Review and confirm the independence of the external auditor, obtain its statements regarding the relationship between auditor and company and non-audit services. 5. Meet with the external auditor when appropriate 6. If necessary, facilitate the obtaining of relevant information required by the auditors. 7. Assess the work of the external auditor appointed by the Board of Directors and hired by the company. 8. Review progress reports from the external auditor. 9. Review the results of the audit of financial statements with management and the external auditor and approve the final report of the latter for submission to the Board of Directors and the Shareholders' Meeting. 10. Review the letter of recommendation.
	<p>Internal Audit and Risk Management</p> <ol style="list-style-type: none"> 1. Promote the creation of the Internal Audit and Risk Control area and approve its bylaws. 2. Select, hire and, if necessary, separate the Internal Audit Manager, reporting to the Board of Directors. 3. Assess compliance with and update the Internal Audit Bylaws. 4. Review the way in which the code of conduct is communicated to company personnel and how its compliance is verified. 5. Supervise and assess the work of the Internal Audit area and approve its budget. 6. Assess the effectiveness and efficiency of the internal control system of the company, including information technology. 7. Ensure the consistency of the Financial Statements submitted to the Board of Directors. 8. Ensure the clarity of the company's transactions with related companies. 9. Summon company officials when necessary. 10. Resolve any type of disagreement between Management and the Internal Audit Manager. 11. Assess and promote the independence of the internal auditors and non-existence of restrictions or limitations to their work. 12. Approve and request the hiring of advisors, accountants, lawyers, or other external services to advise the committee or assist it in the performance of its duties, either on its own initiative or by proposal of the Internal Audit Manager. Approve their fees and expenses with the knowledge of the Board of Directors. 13. Implement an ethical hotline accessible to the entire organization and third parties. 14. Authorize and supervise investigations into matters within its scope of responsibility. 15. Assess the results, and supervise the implementation of the recommendations of the Internal Audit and external auditors. 16. Assess the effectiveness and efficiency of the audit, in compliance with the standards for the professional exercise of the internal audit. 17. Define risk management and control policies. 18. Promote the implementation of the corporate risk management model. 19. Participate in the analysis and definition of the comprehensive risk management model, including the comprehensive risk map. 20. Assess and approve contingency plans for the most relevant risks. 21. Review risk reports and report regularly to the Board of Directors.

COMMITTEE MEMBERS (*): FULL NAME	DATE		POSITION HELD IN THE COMMITTEE
	START (**)	END (***)	
ANDREAS VON WEDEMEYER KNIGGE	11/09/2012		CHAIRMAN
PABLO PESCHIERA ALFARO	11/09/2012		
DIEGO URQUIAGA HEINEBERG	11/09/2012		
RICARDO BUSTAMANTE CILLONIZ	28/04/2016		
% of Independent Directors with respect to the total of the Committee			25%
Number of meetings held during the fiscal year:			5
It has delegated powers in accordance with Article 174 of the General Law of Companies:			Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
The committee or its chairman participates in the Shareholders' Meeting			Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

(*) Information will be provided regarding the persons who are or were members of the Committee during the reporting fiscal year.

(**) Corresponds to the first appointment as a member of the Committee in the reporting company.

(***) Complete only if the person has ceased to be part of the Committee during the fiscal year.

COMMITTEE 2	
Name of Committee:	APPOINTMENTS, REMUNERATION AND HUMAN RESOURCES COMMITTEE
Date of creation:	23/07/2013

Main duties:	Guarantee that human management at the executive level of CAASA is framed within the corporate guidelines and modern practices of Human Development. Furthermore, maintain an equitable and competitive compensation system that allows the fulfillment of the mission and strategic objectives of the organization.
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COMMITTEE MEMBERS (*): FULL NAME	DATE		POSITION HELD IN THE COMMITTEE
	START (**)	END (***)	
FERNANDO CARBAJAL FERRAND	23/07/2013		CHAIRMAN.
ENRIQUE OLAZABAL BRACESCO	23/07/2013		
PABLO PESCHIERA ALFARO	23/07/2013		
JOSE ANTONIO BAERTL MONTORI	25/04/2019		
% of Independent Directors with respect to the total of the Committee			50%
Number of meetings held during the fiscal year:			4
It has delegated powers in accordance with Article 174 of the General Law of Companies:			Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
The committee or its chairman participates in the Shareholders' Meeting			Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

(*) Information will be provided regarding the persons who are or were members of the Committee during the reporting fiscal year.

(**) Corresponds to the first appointment as a member of the Committee in the reporting company.

(***) Complete only if the person has ceased to be part of the Committee during the fiscal year.

COMMITTEE 3	
Name of Committee:	SPECIAL COMMITTEE (NILO)
Date of creation:	21/02/2017
Main duties:	Conduct negotiations for the possible acquisition of a significant percentage of a group of companies and carry out possible legal and financial audits of such companies.

COMMITTEE MEMBERS (*): FULL NAME	DATE		POSITION HELD IN THE COMMITTEE
	START (**)	END (***)	
JOSE ANTONIO BAERTL MONTORI	21/02/2017		
FERNANDO CARBAJAL FERRAND	21/02/2017		
DIEGO URQUIAGA HEINEBERG	21/02/2017		
ANDREAS VON WEDEMAYER KNIGGE	21/02/2017		
ENRIQUE OLAZABAL BRACESCO	21/02/2017		
MANUEL MONTORI BURBANK	22/06/2017		
% of Independent Directors with respect to the total of the Committee			67%
Number of meetings held during the fiscal year:			3
It has delegated powers in accordance with Article 174 of the General Law of Companies:			Sí <input checked="" type="checkbox"/> No <input type="checkbox"/>
The committee or its chairman participates in the Shareholders' Meeting			Sí <input checked="" type="checkbox"/> No <input type="checkbox"/>

(*) Information will be provided regarding the persons who are or were members of the Committee during the reporting fiscal year.

(**) Corresponds to the first appointment as a member of the Committee in the reporting company.

(***) Complete only if the person has ceased to be part of the Committee during the fiscal year.

PRINCIPLE 22: CODE OF ETHICS AND CONFLICTS OF INTEREST

Question III.15

	Yes	No	Explanation:
Does the company take measures to prevent, detect, manage and disclose conflicts of interest that may arise?	X		

Indicate, if applicable, which area and/or person is responsible for monitoring and controlling possible conflicts of interest. If a person is in charge, include additionally his/her position and work area.

Area in charge	Ethics Committee (collaborators and Senior Management)
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PERSON IN CHARGE		
FULL NAME	Cargo	Área
FERNANDO BUSTAMANTE CILLONIZ (chairman)	MANAGER	Strategic Management Control
JUAN MANUEL OTOYA WHERREMS	MANAGER	Human Resources Management
RICARDO GUZMAN VALENZUELA	MANAGER	Administration & Finance
HUMBERTO BARRAGAN HERRERA (secretary)	MANAGER	Internal Audit

Question III.16 / Compliance

	Yes	No	Explanation:
a. Does the company have a Code of Ethics (*), compliance with which is required of its Directors, managers, officials and other collaborators (**) of the company, which includes ethical and professional responsibility criteria, including the handling of potential cases of conflicts of interest?	X		
b. Do the Board of Directors or General Management approve training programs for compliance with the Code of Ethics?	X		

(*) The Code of Ethics may be part of the Internal Standards of Conduct.

(**) The term collaborators embraces all persons who have certain type of labor relationship with the company, regardless of the labor regime or modality.

If the company has a Code of Ethics, indicate the following:

a. It is available to:

	Yes	No
Shareholders	X	
Other persons to whom it applies	X	
The general public	X	

b. Indicate the area and/or person responsible for monitoring and complying with the Code of Ethics. If a person is in charge, include additionally his/her position, work area, and to whom he/her reports.

Area in charge	General Management through the Ethics Committee
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PERSON IN CHARGE			
FULL NAME	POSITION	AREA	REPORTS TO
FERNANDO BUSTAMANTE CILLONIZ (chairman)	MANAGER	Strategic Management Control	GENERAL MANAGER
JUAN MANUEL OTOYA WHERREMS	MANAGER	Human Management	GENERAL MANAGER

RICARDO GUZMAN VALENZUELA	MANAGER	Administration & Finance	GENERAL MANAGER
HUMBERTO BARRAGAN HERRERA (secretary)	MANAGER	Internal Audit	AUDIT AND RISK COMMITTEE

c. Is there a record of cases of breaches of the Code?

Yes No

d. Indicate the number of compliance breaches of the Code that were detected or reported during the fiscal year

Number of compliance breaches	8
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Question III.17

	Yes	No	Explanation:
a. Does the company have mechanisms for reporting any illegal or unethical behavior, guaranteeing the confidentiality of the complaint?	X		THERE IS A COMPLAINTS CHANNEL MANAGED BY A SPECIALIZED COMPANY.
b. Are complaints presented directly to the Audit Committee when those complaints are related to accounting aspects or when the General Management or the Financial Management are involved?	X		A COMMUNICATION PROTOCOL HAS BEEN DEFINED TO REPORT COMPLAINTS RECEIVED THROUGH THE ETHICAL HOTLINE, WHICH GUARANTEES THE CONFIDENTIALITY OF THE COMPLAINT AND WITHOUT INCURRING IN A CONFLICT OF INTEREST.

Question III.18

	Yes	No	Explanation:
a. Is the Board of Directors responsible for monitoring and controlling possible conflicts of interest that may arise in the Board of Directors?	X		
b. If the company is not a financial institution, does it have an established policy indicating that Board members are prohibited from receiving loans from the company or any company in their economic group, unless they have prior authorization from the Board?	X		
c. If the company is not a financial institution, does it have an established policy indicating that members of Senior Management are prohibited from receiving loans from the company or any company in their economic group, unless they have prior authorization from the Director?	X		

a. Indicate the following information on members of Senior Management who are shareholders in a percentage equal to or higher than 5% of the company.

FULL NAME	POSITION	NUMBER OF SHARES	% OF TOTAL SHARES
RICARDO CILLONIZ REY	Project and Mining Manager	76,017,839	8.53

b. Indicate whether any of the members of the Board of Directors or Senior Management of the company are spouses, relatives in the first or second degree by consanguinity, or relatives in the first degree by affinity:

FULL NAME	RELATIONSHIP WITH:			FULL NAME OF SHAREHOLDER / DIRECTOR / MANAGER	TYPE OF RELATIONSHIP (**)	ADDITIONAL INFORMATION (***)
	SHAREHOLDER (C)	DIRECTOR	SENIOR MANAGEMENT			
RICARDO CILLONIZ CHAMPIN	X	X		RENEE CILLONIZ DE BUSTAMANTE	2ND DEGREE BY CONSANGUINITY	
RENEE CILLONIZ DE BUSTAMANTE		X		RICARDO BUSTAMANTE CILLONIZ	1ST DEGREE BY CONSANGUINITY	
RICARDO BUSTAMANTE CILLONIZ			X	FERNANDO BUSTAMANTE CILLONIZ (1)	2ND DEGREE BY CONSANGUINITY	(1) STRATEGIC CONTROL MANAGER
RICARDO CILLONIZ CHAMPIN	X		X	RICARDO CILLONIZ REY (2)	1ST DEGREE BY CONSANGUINITY	(2) PROJECT AND MINING MANAGER
RICARDO CILLONIZ CHAMPIN		X		RICARDO BUSTAMANTE CILLONIZ	3RD DEGREE BY CONSANGUINITY	

(*) Shareholders holding 5% or more of the capital stock

(**) For the purposes of the relationship, the relationship criteria contained in the Regulations on Indirect Ownership, Relationship and Economic Groups will be applied.

(***) In the event that there is a relationship with a shareholder, include its shareholding. In the event that the relationship is with a member of the senior management, include his/her position.

c. In the event that any member of the Board of Directors occupies or has occupied during the period covered by this report any managerial position in the company, indicate the following information:

FULL NAME	MANAGERIAL POSITION CURRENTLY OR PREVIOUSLY HELD	PERIOD IN THE MANAGERIAL POSITION	
		START (*)	END (**)
RICARDO CILLONIZ CHAMPIN	CHAIRMAN	01/01/2007	

(*) Corresponds to the first appointment in the reporting company in the managerial position.

(**) Complete only in the event that the person left the managerial position during the fiscal year.

d. In the event that any member of the Board of Directors or Senior Management of the company has maintained during the fiscal year any commercial or contractual relationship with the company that has been important due to its amount or subject matter, indicate the following information.

FULL NAME	TYPE OF RELATIONSHIP	BRIEF DESCRIPTION

PRINCIPLE 23: RELATED PARTY OPERATIONS

Question III.19

	Yes	No	Explanation:
a. Does the Board of Directors have policies and procedures for the valuation, approval and disclosure of certain operations between the company and related parties, as well as for knowing the commercial or personal, direct or indirect relationships that the Directors maintain among them, with the company, with their suppliers or customers, and other stakeholders?	X		
b. In the case of operations of special relevance or complexity, is the intervention of independent external advisors considered for evaluation?	X		

a. If you comply with subparagraph a) of question III.19, indicate the area(s) of the company in charge of dealing with related party operations in the following aspects:

ASPECTS	AREA IN CHARGE
Assessment	AUDIT COMMITTEE
Approval	BOARD OF DIRECTORS
Disclosure	ADMINISTRATION AND FINANCE MANAGEMENT

b. Indicate the procedures for approving related party operations:

The procedures are established in Section 8: Framework of Conduct contained in the Corporate Policy for Transactions among Related Parties
--

c. Give details of any operations carried out between the company and its related parties during the fiscal year that were significant in terms of their amount or subject matter.

COMPANY NAME OR BUSINESS NAME OF THE RELATED PARTY	NATURE OF THE RELATIONSHIP (*)	TYPE OF OPERATION	AMOUNT (\$/)
Tradi S.A.	Related	Rebar , wire rod, etc	176,329,000
Aceros América S.R.L.	Subsidiary	Rebar , wire rod, etc	269,263,000
Aceros America S.A.S	Subsidiary	Rebar , wire rod, etc	97,235,000
Comfer S.A.	Subsidiary	Rebar , wire rod, etc	11,216,000
Aceros América S.R.L.	Subsidiary	Purchase of scrap metal	70,933,000
Transportes Barcino S.A.	Subsidiary	Cargo service	29,905,000
Comercial del Acero S.A.	Subsidiary	Purchase of merchant bars, sheets, plates & coils and others	142,316,000

Comfer S.A.	Subsidiary	Purchase of merchant bars, sheets, plates & coils and others	36,183,000
Aceros América SpA	Subsidiary	Purchase of scrap metal	10,913,000
Tecnología y Soluciones Constructivas S.A.	Subsidiary	Value-added design and engineering services for the construction sector	9,151,000

(*) The relationship shall be determined using the Provisions established for the application of Section 51, Point c) of the Stock Market Act, approved by Resolution 029-2018-SMV/01, as substituted.

d. Specify whether the company sets limits for carrying out operations with related parties:

Yes

No

PRINCIPLE 24: FUNCTIONS OF SENIOR MANAGEMENT

Question III.20 / Compliance

	Yes	No	Explanation:
a. Does the company have a clear policy of mark off functions among the management or governance of the Board of Directors, the regular management of the Senior Management and the leadership of the CEO?	X		
b. Do the tasks of the CEO and Chairman of the Board of Directors are performed by different persons?	X		
c. Does Senior Management have sufficient autonomy to carry out the assigned functions, within the framework of policies and guidelines defined by the Board of Directors, and under their control?	X		
d. Is the CEO responsible for complying with and enforcing the policy of providing information to the Board of Directors and its Directors?	X		
e. Does the Board of Directors annually assess the performance of the CEO based on well-defined standards?	X		
f. Does the remuneration of the Senior Management have a fixed and a variable component, which takes into consideration the results of the company, based on prudent and responsible assumption of risks, and compliance with the goals set forth in the respective plans?	X		

a. Indicate the following information regarding the remuneration received by the CEO and senior management (including bonuses).

POSITION	REMUNERATION (*)	
	FIXED	VARIABLE
CEO	0.03	0.01
SENIOR MANAGEMENT	0.17	0.04

(*) Indicate the percentage represented by the total amount of the annual remuneration of the members of Senior Management, with respect to the level of gross income, according to the financial statements of the company. financieros de la sociedad.

b. In the event that the company pays bonuses or indemnities other than those determined by legal mandate, to Senior Management, indicate the form(s) in which these are paid.

	CEO	MANAGERS
Delivery of shares		
Delivery of options		
Delivery of money	X	X
Other / Detail		

c. If there is a variable component in the remuneration, specify which are the main aspects taken into account for its determination.

EBITDA, INVENTORY COVERAGE RATIOS, ROA, ETC

d. Indicate whether the Board of Directors assessed the performance of the CEO during the fiscal year.

Yes

No

PILLAR IV - Risk and Compliance

PRINCIPLE 25: RISK MANAGEMENT SYSTEM ENVIRONMENT

Question IV.1

	Yes	No	Explanation:
<p><i>a. Does the Board of Directors approve a comprehensive risk management policy according to its size and complexity, promoting a risk management culture within the company, from the Board of Directors and Senior Management to the employees?</i></p>	X		
<p><i>b. Does the comprehensive risk management policy cover all the companies that are part of the group and allow an overview of critical risks?</i></p>		X	<p>THE POLICY HAS BEEN IN PLACE FOR THE COMPANY SINCE 2017. THE IMPLEMENTATION BEGAN IN 2020 IN THE SUBSIDIARIES AND WILL BE COMPLETED IN 2022. WHEN THE IMPLEMENTATION IS DONE IN ALL SUBSIDIARIES, THERE WILL BE A COMPREHENSIVE RISK MANAGEMENT UNDER THE COMPANY'S STANDARD.</p>

Does the Company have a risk delegation policy that establishes the risk limits that may be managed by each level of the Company?

Sí

No

Question IV.2

	Yes	No	Explanation:
<p><i>a. Does the CEO manage the risks to which the company is exposed and communicate those risks to the Board of Directors?</i></p>	X		
<p><i>b. Is the CEO responsible for the risk management system, in case there is no Risk Committee or Risk Management?</i></p>	X		The firma has a Risk Committee

Does the company have a Risk Manager?

Yes

No

If yes, please provide the following information:

FULL NAME	DATE OF EXERCISE OF THE POSITION		REPORTS TO
	START ^(*)	END ^(**)	
FERNANDO BUSTAMANTE CILLONIZ			CEO

^(*) Corresponds to the first appointment in the reporting company.

^(**) Complete only in the event that the person has ceased to hold the position during the fiscal year.

Question IV.3

	Yes	No	Explanation:
<p><i>Does the company have an internal and external control system, the effectiveness and suitability of which is supervised by the Board of Directors of the company?</i></p>	X		

PRINCIPLE 26: INTERNAL AUDIT

Question IV.4

	Yes	No	Explanation:
a. Does the internal auditor carry out audit work exclusively, does he/she have autonomy, experience and specialization in the matters under evaluation, and independence for monitoring and assessing the effectiveness of the risk management system?	X		
b. Are the duties of the internal auditor the permanent assessment of the validity and reliability of all the financial information generated or registered by the company, as well as the verification of the effectiveness of regulatory compliance?	X		
c. Does the internal auditor report directly to the Audit Committee on its plans, budget, activities, progress, results obtained and actions taken?	X		

a. Indicate whether the company has an independent area in charge of internal audit.

Yes No

If the answer to the previous question is yes, within the organizational structure of the company indicate, hierarchically, who is responsible for the audit.

It depends on:	AUDIT AND RISK COMMITTEE
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b. Indicate whether the company has a Corporate Internal Auditor.

Yes No

Indicate the main responsibilities of the person in charge of the internal audit and whether he/she performs other duties than internal audit.

<ul style="list-style-type: none"> a) Prepares and executes the Annual Audit Plan based on the identification and analysis of risks, previously approved by the ARC. b) Regularly reports the execution status of the audit plan to the ARC. c) Provides advice on Internal Control, Risks and Corporate Governance to the company's Management and to the ARC. d) Timely issues internal audit reports with results of control evaluation. e) Regularly monitors action plans arising from internal and external audit observations and recommendations. f) Supports the Chairman of the ARC in the organization of the agendas of the audit committee, acting as Technical Secretary of the Committee. g) Supports the ARC in the Selection, Contracting, Supervision and Evaluation of the work of the external auditor of the Financial statements of the company. h) Collaborates in the investigation of ethical complaints filed through the Complaints Channel of the company

Question IV.5

	Yes	No	Explanation:
Does the appointment and resignation of the Internal Auditor decision correspond to the Board of Directors, after the proposal of the Audit Committee?	X		

PRINCIPLE 27: EXTERNAL AUDITORS

Question IV.6

	Yes	No	Explanation:
<i>Does the Shareholders' Meeting, at the proposal of the Board of Directors, appoint the audit company or the independent auditor, who maintain a clear independence from the company?</i>	X		UNLESS EXPRESSLY DELEGATED BY THE BOARD OF DIRECTORS.

a. Does the company have a policy for the appointment of an External Auditor?

Yes No

If yes, describe the procedure for hiring the audit company responsible for auditing the annual financial statements (including identification of the body of the company responsible for selecting the audit company).

POLICY FOR THE CONTRACTING AND SUPERVISE THE WORK OF THE EXTERNAL AUDITOR OF FINANCIAL STATEMENTS, was reviewed and approved by the Audit and Risk Committee in March 2014.
 The Policy considers the following activities:
 1. Preparation of the terms and conditions of the service to be contracted.
 2. Evaluation of the offers considering legal, technical and economic aspects of the bidders.
 3. The Audit and Risk Committee selects the best offer, which includes value-added services and suggests its hiring to the Board of Directors and the Shareholders' Meeting.

b. In the event that the audit company has provided services other than the audit of accounts, indicate whether such hiring was reported to the Shareholders' Meeting, including the percentage of invoicing that such services represent over the total invoicing of the audit company to the company.

Yes No

c. Do the persons or entities related to the audit company provide services to the company, other than those of the audit of accounts?

Yes No

If the answer to the previous question is yes, indicate the following information regarding the additional services provided by persons or entities related to the audit company in the reporting year.

CORPORATE NAME OR BUSINESS NAME	ADDITIONAL SERVICES	% OF REMUNERATION (*)
ERNST & YOUNG LAW S.C.R.L.	LEGAL ADVISORY	53.6
ERNST & YOUNG ASESORES S.C.R.L.	TAX ADVISORY	37.5

(*) Invoicing of additional services over invoicing of audit services

d. Indicate whether the audit company has used different employees, if it has provided additional services to the audit of accounts.

Yes No

Question IV.7

	Yes	No	Explanation:

a. Does the company have a policy of renewal of its independent auditor or audit company?	X		
b. If this policy establishes longer periods for renewal of the audit company, does the team work of the audit company rotate at most every five (5) years?	X		

Indicate the following information in relation to the audit companies that have provided audit services to the Company in the last five (5) years.

BUSINESS NAME OF THE AUDIT COMPANY	SERVICE (*)	PERIOD	REMUNERATION (**)	% OF REVENUES OF THE AUDIT COMPANY
TANAKA, VALDIVIA Y ASOCIADOS, S.CIVIL DE R.L., REPRESENTATIVES OF E Y INTERNATIONAL	EXTERNAL AUDIT OF FINANCIAL STATEMENTS	2021	100	
PAREDES, BURGA & ASOCIADOS S.CIVIL DE R.L., REPRESENTATIVES OF E Y INTERNATIONAL	EXTERNAL AUDIT OF FINANCIAL STATEMENTS	2020	87	
PAREDES, BURGA & ASOCIADOS S.CIVIL DE R.L., REPRESENTATIVES OF E Y INTERNATIONAL	EXTERNAL AUDIT OF FINANCIAL STATEMENTS	2019	100	
PAREDES, BURGA & ASOCIADOS S.CIVIL DE R.L., REPRESENTATIVES OF E Y INTERNATIONAL	EXTERNAL AUDIT OF FINANCIAL STATEMENTS	2018	87	
PAREDES, BURGA & ASOCIADOS S.CIVIL DE R.L., REPRESENTATIVES OF E Y INTERNATIONAL	EXTERNAL AUDIT OF FINANCIAL STATEMENTS	2017	86	
PAREDES, BURGA & ASOCIADOS S.CIVIL DE R.L., REPRESENTATIVES OF E Y INTERNATIONAL	EXTERNAL AUDIT OF FINANCIAL STATEMENTS	2016	100	

(*) Include all types of services, such as financial information reports, accounting expert evidence, operational audits, system audits, tax audits or other services.

(**) Of the total amount paid to the audit company for all items, indicate the percentage that corresponds to remuneration for financial audit services.

Question IV.8

	Yes	No	Explanation:
<i>In the case of economic groups, is the external auditor the same for the whole group, including off-shore subsidiaries?</i>	X		EXCEPT: INMOBILIARIA COMERCIAL DEL ACERO ARGENTINA SAC, INMOBILIARIA COMERCIAL DEL ACERO CAJAMARQUILLA SAC, CORP. ACEROS AREQUIPA DE IQUITOS SAC, ACEROS AMERICA SAS, ACEROS INSTALADO S.A, ACEROS AMERICA SPA Y ACEROS AMERICA CORPORATION, AND ACEROS AMERICA S.R.L

Indicate whether the audit company contracted to audit the financial statements of the company for the fiscal year subject matter of this report also audited the financial statements for the same fiscal year for other companies in its economic group.

Yes

No

If your previous answer is yes, indicate the following:

CORPORATE NAME OR BUSINESS NAME OF THE COMPANY (IES) OF THE ECONOMIC GROUP
TRANSPORTES BARCINO S.A.
COMERCIAL DEL ACERO S.A.C. EN LIQUIDACIÓN

TECNOLOGÍA Y SOLUCIONES CONSTRUCTIVAS S.A.C.

COMFER S.A. EN LIQUIDACIÓN

PILLAR V - Transparency of Information

PRINCIPLE 28: INFORMATION POLICY

Question IV.1

	Yes	No	Explanation:
<i>Does the company have an information policy for shareholders, investors, other stakeholders and the market in general, with which it defines in a formal, orderly and comprehensive manner the guidelines, standards and criteria that will be applied to the management, collection, elaboration, classification, organization and/or distribution of the information generated or received by the company?</i>	X		

a. If so, indicate whether, in accordance with its information policy, the company disseminates the following:

	Yes	No
Objectives of the company	X	
List of members of the Board of Directors and Senior Management	X	
Shareholding structure		X
Description of the economic group to which it belongs	X	
Financial Statements and Annual Report	X	
Other / Detail		

b. Does the company have a corporate website?

Yes No

The corporate website includes:

	Yes	No
A special section on corporate governance or relations with shareholders and investors that includes a Corporate Governance Report	X	
Important facts	X	
Financial information	X	
Bylaws	X	
Regulations of the Shareholders' Meeting and information on Meetings (attendance, minutes, other)	X	
Composition of the Board of Directors and its Regulations	X	
Code of Ethics	X	
Risk policy	X	
Corporate Social Responsibility (community, environment, other)	X	
Other / Detail		

Question IV.2

	Yes	No	Explanation:

<i>Does the company have an investor relations office?</i>	X	THE SECURITIES AREA, WHICH REPORTS TO THE CFO, PERFORMS THIS FUNCTION. CONTACT MAIL: accionistas@aasa.com.pe
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If you have an investor relations office, please indicate who is responsible.

Responsible for the Investor Relations Office	DEPUTY MANAGER OF CORPORATE FINANCE AND INVESTOR RELATIONS
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If you do not have an investor relations office, indicate the unit (department/area) or person in charge of receiving and processing requests for information from shareholders of the company and the general public. If a person, include additionally his/her position and work area.

Area in charge	
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PERSON IN CHARGE		
FULL NAME	POSITION	AREA

PRINCIPLE 29: FINANCIAL STATEMENTS AND ANNUAL REPORT

If there are qualifications in the report by the external auditor, have these qualifications been explained and/or justified to the shareholders?

Yes

No

PRINCIPLE 30: INFORMATION ON SHAREHOLDING STRUCTURE AND RESOLUTIONS

Question IV.3

	Yes	No	Explanation:
<i>Does the company disclose the ownership structure, considering the different classes of shares and, if applicable, the joint equity interest of a particular economic group?</i>	X		LIMITED TO DISCLOSURE OF OWNERSHIP

Indicate the composition of the shareholding structure of the company at the fiscal year end.

HOLDING OF VOTING SHARES	NUMBER OF HOLDERS (AT THE FISCAL YEAR END)	% OF SHARES
Less than 1%	386	23.49
Between 1% and 5%	12	22.1
Between 5% and 10%	4	27.51
More than 10%	2	26.89
Total	404	100

HOLDING OF NON-VOTING SHARES (IF APPLICABLE)	NUMBER OF HOLDERS (AT THE FISCAL YEAR END)	% OF SHARES
Less than 1%		
Between 1% and 5%		
Between 5% and 10%		
More than 10%		
Total		

HOLDING OF INVESTMENT SHARES (IF APPLICABLE)	NUMBER OF HOLDERS (AT THE FISCAL YEAR END)	% OF SHARES
Less than 1%	2360	61.84
Between 1% and 5%	11	22.37
Between 5% and 10%	2	15.79
More than 10%	0	0
Total	2373	100

Percentage of treasury shares over capital stock:

0

Question IV.4

	Yes	No	Explanation:
<i>Does the company report on agreements or covenants among shareholders?</i>	X		

a. Does the company have any current agreement with its shareholders?

Yes

No

b. If there has been any covenant or agreement among shareholders that has been reported to the company during the fiscal year, indicate the matters discussed by each of them.

Election of Board Members	
Exercise of voting rights in meetings	
Restriction on the free transfer of shares	
Changes in the company's internal or statutory rules	

Other /Detail	
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PRINCIPLE 31: CORPORATE GOVERNANCE REPORT

Question IV.5

	Yes	No	Explanation:
<i>Does the company disclose the standards adopted in corporate governance matters in an annual report, the content of which is the responsibility of the Board of Directors, following a report from the Audit Committee, the Corporate Governance Committee or an external consultant, if applicable?</i>	X		FOR THE TIME BEING, THE COMPANY DOES NOT HAVE A REPORT ON GOOD CORPORATE GOVERNANCE INDEPENDENT OF THIS REPORT.

a. Does the company have mechanisms for the internal and external dissemination of corporate governance practices?

Yes

No

If yes, specify the mechanisms used.

THE SELF-ASSESSMENT ON COMPLIANCE WITH THE PRINCIPLES OF GOOD CORPORATE GOVERNANCE IS INCLUDED IN THE QUESTIONNAIRE THAT IS PART OF THE ANNUAL REPORT. SUCH REPORT, INCLUDING THE SELF-ASSESSMENT, IS PUBLISHED ON OUR WEBSITE AND ON THE PORTAL OF THE STOCK MARKET SUPERINTENDENCY.

SECTION C:

Contents of documents of the company

INDICATE IN WHICH OF THE FOLLOWING DOCUMENT(S) OF THE COMPANY, THE FOLLOWING MATTERS ARE REGULATED:

		PRINCIPLE	BYLAWS	INTERNAL REGULATIONS (*)	MANUAL	OTHER	NOT REGULATED	NOT APPLICABLE	NAME OF DOCUMENT (**)
1	Policy for the redemption or exchange of non-voting shares	1					X		
2	Method of registering the rights of ownership of shares and responsible for registration	2			X				INSTRUCTIONS ON RECORDING ENDING BALANCE OF SHARES
3	Procedures for the selection of an external advisor to issue an independent opinion on the proposals of the Board of Directors of corporate operations that may affect the right of non-dilution of the shareholders	3		X					
4	Procedure for receiving and responding to requests for information and shareholders' opinions	4				X			CORPORATE INFORMATION POLICY (PAGES 6 TO 9)
5	Dividend policy	5				X			RESOLUTION OF SHAREHOLDERS' MEETING (03/23/2016)
6	Policies or resolutions not to adopt anti-absorption mechanisms	6					X		
7	Arbitration agreement	7	X						TITLE SEVEN, ART. 74
8	Policy for the selection of Directors of the company	8		X					
9	Policy for evaluating the remuneration of the company's Directors	8						X	
10	Mechanisms for making available to shareholders information on topics contained in the agenda of the Shareholders' Meeting and proposals for resolutions	10				X			CORPORATE INFORMATION POLICY
11	Additional channels different from those established by law, used by the company to call to Meetings	10				X			CORPORATE INFORMATION POLICY
12	Additional mechanisms for shareholders to make proposals for agenda topics to be discussed at the Shareholders' Meeting	11		X					REGULATIONS OF THE SHAREHOLDERS' MEETING
13	Procedures for accepting or rejecting shareholders' proposals of agenda topics to be discussed at the Shareholders' Meeting	11		X					REGULATIONS OF THE SHAREHOLDERS' MEETING, ART. 9°
14	Mechanisms that allow remote participation of shareholders	12	X						BYLAWS OF THE COMPANY, ART. 25°
15	Procedures for emitting differentiated votes by shareholders	12		X					REGULATIONS OF THE SHAREHOLDERS' MEETING, ART. 20°

16	Procedures to be followed in proxy voting	13	X	X				
17	Requirements and observance for a shareholder to be represented at a Meeting	13	X					
18	Procedures for the proxy vote in favor of the Board members or of the Senior Management	13		X				
19	Procedure for following up on the resolutions of the Shareholders' Meeting.	14				X		IT IS REGULATED IN ACCORDANCE WITH ARTICLE 23 IN REGULATIONS OF THE SHAREHOLDERS' MEETING. HOWEVER, WE DO NOT HAVE SPECIFIC PROCEDURES.
20	Minimum and maximum number of Directors that make up the company's Board of Directors	15	X					
21	The duties, rights and functions of the company's Directors	17	X	X				
22	Types of bonuses received by the Board of Directors after the achievement of corporate goals	17					X	
23	Policy for hiring advisory services for the Directors	17		X				REGULATIONS OF THE BOARD OF DIRECTORS
24	Induction policy for new Directors	17		X				
25	Special requirements to be an Independent Director of the company	19		X				
26	Criteria for evaluating the performance of the Board of Directors and its members	20		X				
27	Policy of determination, monitoring and control of possible conflicts of interest	22				X		REGULATIONS OF THE SHAREHOLDERS' MEETING, ART. 20°
28	Policy defining the procedure for the assessment, approval and disclosure of related party operations	23				X		CORPORATE POLICY ON TRANSACTIONS BETWEEN RELATED PARTIES.
29	Responsibilities and functions of the Chairman of the Board of Directors, Chief Executive Officer, and other senior managers	24	X	X				
30	Criteria for the assessment of Senior Management performance	24				X		
31	Policy to set and evaluate the remunerations of Senior Management	24				X		
32	Comprehensive risk management policy	25				X		INTERNAL CONTROL POLICY AND COMPREHENSIVE RISK MANAGEMENT

33	Responsibilities of the person in charge of Internal Audit	26				X			BYLAWS OF THE INTERNAL AUDIT ACTIVITY
34	Policy for the appointment of the External Auditor, term of the contract and criteria for renewal	27				X			EXTERNAL AUDITOR CONTRACTING POLICY
35	Policy for disclosure and communication of information to investors	28				X			CORPORATE INFORMATION POLICY

(*) Includes Regulations of the Shareholders' Meeting, Regulations of the Board of Directors or others issued by the Company

(**) Indicate the denomination of the document, except in the case of the Bylaws of the Company



PERÚ

Ministerio
de Economía y Finanzas

SMV
Superintendencia del Mercado
de Valores

DECENIO DE LA IGUALDAD DE OPORTUNIDADES PARA MUJERES Y HOMBRES

SECTION D:

Other Information of Interest ¹

We have nothing further to add.

¹ Includes other information of interest not addressed in previous sections that may provide investors and other stakeholders with a better picture of other good corporate governance practices implemented by the Company, as well as practices tied to corporate social responsibility, institutional investor relations, etc.

The Company may also indicate whether it has voluntarily adhered to further international, sectorial, or other codes of ethical principles or good practices, indicating the code and the date of adhesion.