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SAGRILIFT AND PTEE POLICY

1. PURPOSE

Define the guidelines under which efficient self-management and risk control associated with Money Laundering (ML), Terrorism Financing (TF), Financing of the Proliferation of Weapons of Mass Destruction FPWMD Transnational Bribery, and Corruption, as well as its source crimes, establishing a management style that guarantees excellence, integrity, transparency, that complies with the legal basis and practices of good corporate governance and sustainability.

2. SCOPE

This policy is strictly complied with by the Shareholders, Administrators, Employees, Customers, Suppliers, and interested parties of **Aceros Arequipa S.A.S.**, hereinafter the Company.

3. JUSTIFICATION

Contribute to the ethical and transparency culture defined in the corporate guidelines defined in the Code of Ethics, the Code against Fraud and Corruption Acts, and Code of Ethics for Suppliers, as well as the Colombian legal basis.

4. GUIDELINES

4.1. The Company rejects Money Laundering (ML), Terrorism Financing (TF), Financing of the Proliferation of Weapons of Mass Destruction (FPWMD), Transnational Bribery, Corruption, and their predicate offenses. It is obliged and committed to comply with the regulations of the “Superintendencia de Sociedades” and has implemented a Comprehensive Risk Self-Control and Management System (SAGRILAF) and a Business Ethics and Transparency Program (PTEE), prioritizing its compliance over achieving commercial and/or financial goals and safeguarding its image and reputation.

4.2. The Comprehensive Risk Self-Control and Management System (SAGRILIFT) and the Business Ethics and Transparency Program (PTEE) establish guidelines and internal control mechanisms applicable during the relationship with all its stakeholders, in all company activities, allowing the reliable and thorough identification of stakeholders, as well as the verification and monitoring of the information provided by them, in order to avoid establishing a link with people or companies involved in crimes of the scope.

4.3. The role of Compliance Officer has been defined as the natural person designated by the Company who is in charge of promoting, developing, and ensuring compliance with the specific prevention, update, and risk mitigation procedures.

4.4. *The Compliance Officer shall present at least once a year a report on his management to the General Shareholders' Meeting of the Company and to the Audit and Risk Committee of the Board of Directors of Corporacion Aceros Arequipa and will also participate in the latter whenever invited.*

4.5. The Company will not have contractual ties with any natural or legal person involved in or related to offenses within the scope, therefore, it will refrain from carrying out any operations to the extent that, with the verification and monitoring of information from the interested party, it can reasonably determine that it is a suspicious transaction or indicates illicit purposes.

4.6. The verification prior to the beginning of the commercial relationship will be conducted against restrictive and/or binding lists for legal entities and individuals listed in the certificate of existence and representation of the Chamber of Commerce, according to the risk level of the counterparties, likewise, the legal representatives and final beneficiaries will also be verified. Additionally, due diligence regarding Politically Exposed Persons (PEP), according to the regulatory definition. As well as annually and as part of the monitoring, the restrictive and/or binding lists for each counterparty will be reviewed.

4.7. The Company will report to the Financial Information and Analysis Unit (UIAF), through the Compliance Officer, those transactions that may qualify as suspicious. However, the Company will not require certainty that it is a criminal activity, nor will it need to identify the type of offense or whether the funds involved come from such activities.

4.8. The Company does not maintain business or commercial relationships with counterparts that have businesses whose nature makes it difficult to verify the transparency of their activity, origin of their resources or that refuse to provide the information and documentation required.

4.9. Some counterparties may expose the Company to higher risks within the policy's scope. Therefore, employees and the Compliance Officer will consider applying Enhanced Due Diligence procedures when counterparties are located in non-cooperative countries or due to their relationships with Politically Exposed Persons (PEP).

4.10. It is considered that there is a conflict of interest related to the crimes of the scope, in the following situations:

a) When the verification and monitoring of information of the interested party is carried out by a collaborator on their spouse or permanent partner, relatives within the fourth degree of consanguinity, second of affinity or first civil, or with respect to those operations in which the person in charge of carry out the verification has any personal interest, direct or indirect, in the result.

b) When in the preparation of reports to authorities, the person in charge of determining the admissibility of the external report is affected by the decision-making process.

In any of the events listed, the person in conflict must report it directly to the Compliance Officer.

In the event that the person in conflict is the Compliance Officer, and he is the one who notices said conflict, he must immediately remove himself from the situation and delegate all his functions to a Substitute Compliance Officer.

In case that it is a third party who notices the conflict of the Compliance Officer, he must notify the Board of Shareholders so that this body designates another person to carry out these ad hoc tasks.

4.11. The payment of the clients will be made through a bank entity by means of transfer or deposit to an account. Payment in cash through the sales force is not authorized. Payment to suppliers will be made by bank transfer and in favor of the holder of the obligation.

4.12. The Company promotes a culture of transparency, ethics, and prevention through awareness, training, and annual communication programs that ensure its shareholders, employees, and interested parties know, apply and comply with the provisions of the Comprehensive Risk Self-Control and Management System (SAGRILAFT) and the Business Ethics and Transparency Program (PTEE), under penalty of sanctions and criminal and administrative consequences in case of non-compliance.

4.13. Failure to comply with this policy and its associated documentation, whether intentional or caused by carelessness or negligence of any employee or interested party, will be sanctioned in accordance with the contractually signed commitments, labor law and the disciplinary action procedure without prejudice to the consequences civil, administrative and criminal that such conduct may entail.