

ANTI-BRIBERY AND OTHER CRIMES MANAGEMENT SYSTEM



ACEROS
AREQUIPA



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INTEGRITY AND TRANSPARENCY

In Aceros Arequipa and its subsidiary companies we have **corporate guidelines** that establish our behavioral, values and business practices standards that guide our decisions and business relationships.

Our corporate guidelines are the basis of our **integrity and transparency culture**.



CORPORATE GUIDELINES



CODE OF ETHICS

Defines the principles that guide each collaborator's behavior during the interaction with their co-workers, suppliers, clients, and all their stakeholders.



CODE AGAINST ACTS OF FRAUD AND CORRUPTION

Defines the guidelines and responsibilities to prevent, detect, investigate and respond to fraud and corruption.



INTEGRATED MANAGEMENT SYSTEM POLICY

Summarizes the guidelines and commitments for the sustainable management of all our processes.

ANTI-BRIBERY AND OTHER CRIMES MANAGEMENT SYSTEM

At Aceros Arequipa we have implemented an **Anti-bribery and other Crimes Management System** (onwards **SGAD** by its acronym in Spanish), in compliance with a **responsible, transparent and ethical management**, as well as with the **legal framework** of each country in which we operate, with the aim of preventing and dealing with possible acts of corruption, money laundering and terrorist financing; thus strengthening our **culture of integrity, transparency and zero tolerance towards corruption**.

SGAD ELEMENTS





1. PREVENTION MANAGER

It's a role designated by the Board of the company.

RESPONSIBILITIES

- Implement and ensure the continuous operation and maintenance of the system.
- Inform the Board of Directors about the effectiveness of the system and the controls execution, as well as the opportunities to improve the whole system and the progress of their implementation.



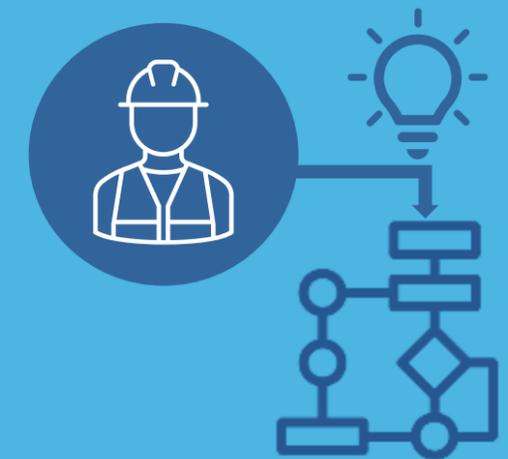


2. RISK MANAGEMENT

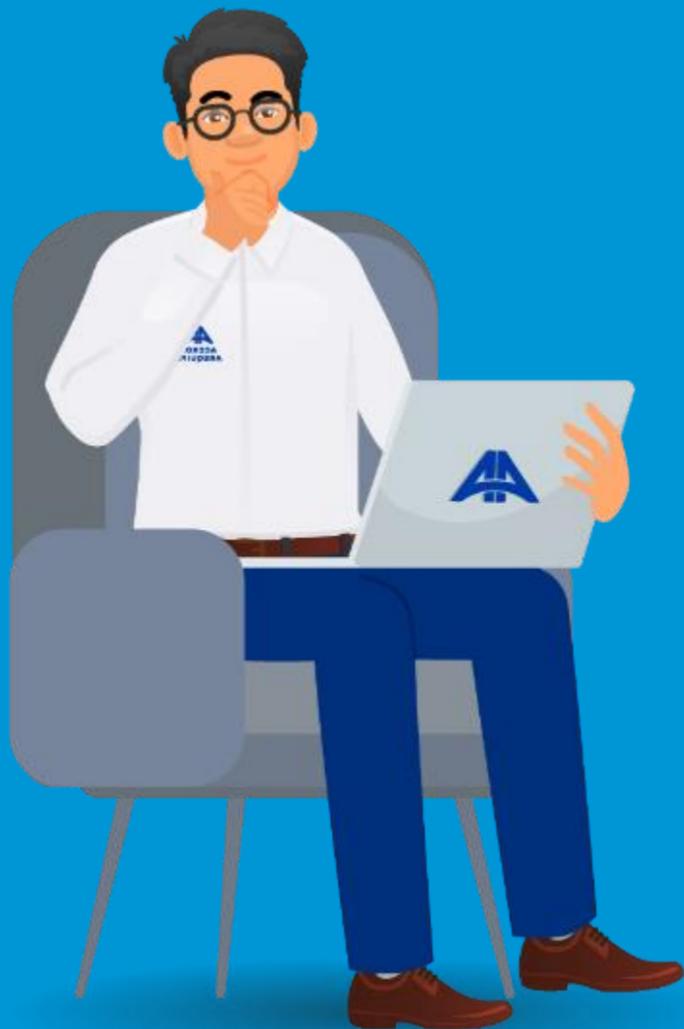
In compliance with our **Internal Control and Integrated Risk Management Corporate Policy** and according to the good practices defined in our **IROM Methodology** (Metodología GIRO, in Spanish), we evaluate our processes and **identify risks related to corruption, money laundering and financing of terrorism**, in order to strengthen our current controls and to establish new ones (financial or non-financial controls) to reduce our risk exposure.



Risk identification and assessment is carried out by the processes owners, with the support and monitoring of the Prevention Manager and the Risk Management Department.



Risks are classified according to its criticality level in **High, Considerable and Moderate**, thus defining the Aceros Arequipa's **Risk Profile** associated with the Anti-bribery Management and other Crimes.





2. RISK MANAGEMENT

DUE DILIGENCE

We assess the nature and scope of corruption, money laundering and terrorist financing risks in the interaction with our different **business partners**, to establish specific controls to strenght our **knowledge of each of them, before starting a new comercial relationship and annually** as a continuous monitoring measure.

We apply due diligence to our customers, suppliers, transport companies, donation recipients, third parties that act on behalf of Aceros Arequipa or its subsidiaries, and our employees, maintaining a transparent relationship and operating responsibly.



Customers



Suppliers



third parties



Third parties that
act on behalf of
Aceros Arequipa



Transport
companies



Donation
recipients



Employees





2. RISK MANAGEMENT

RELATIONSHIP WITH PUBLIC ENTITIES

Every employee and third party that interacts with Public Officials on behalf of Aceros Arequipa or its subsidiary companies, must comply with the guidelines established in our **Protocol for Interaction with Public Officials**, in order to prevent risks of public corruption and ensure ethical and transparent relations.



We have defined **vulnerability levels according to the type of interaction** with any Public Official.

The **highly vulnerable situations** must be reported to the Prevention Manager:



Work meetings with state business partners



Attention to audits, inspections and similar



Social events organized by public entities



Committees, boards, directory in which Public Officials participate



3. ETHICAL LINE

Through our Ethical Line can be **report irregular situations that violate our corporate ethical guidelines and the law**, such as acts of corruption, money laundering and terrorist financing, among other crimes.

Line **Ethics of Steel**



Confidential and anonymous



Operated by an independent and specialized company



For use of employees, clients, suppliers and general public



Available 24 hours a day, 365 days

Attention **channels**



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free line

 0800 -1-8134

 0-1-8000-930989

 0800-110-403

 1800-001-604

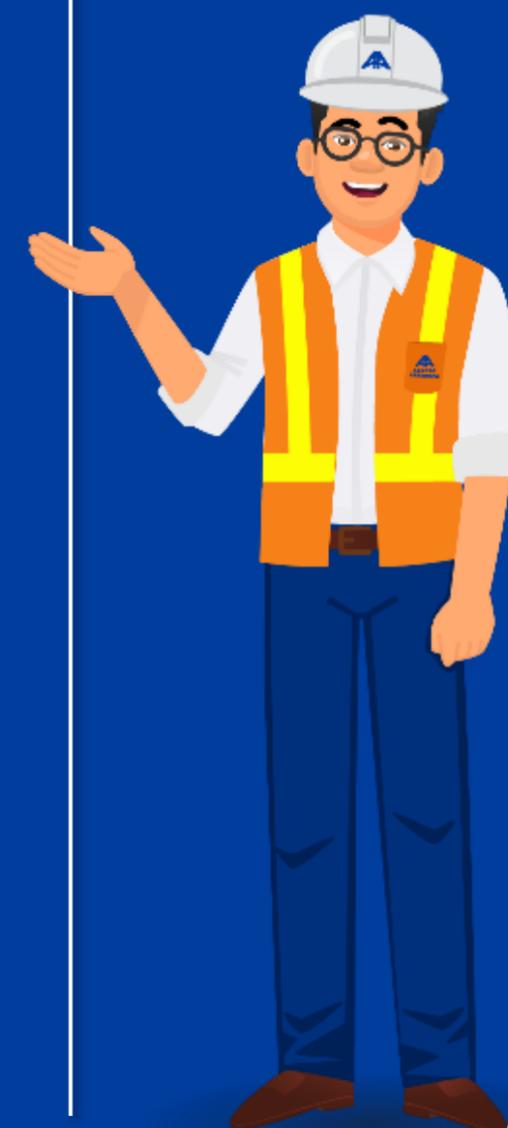
 800-914-383

 (833) 604-0957



line with cost

 +511 219-7134





4. COMMUNICATION AND TRAINING



We continuously reinforce with our employees and business partners our ethical principles and zero tolerance against corruption, money laundering, terrorist financing, and other crimes, through periodic training and internal and external communications.



ANNUAL TRAINING AND COMMUNICATION PROGRAM



Communications



Web page



Mailing



Internal magazine



educational videos

Trainings



To our Office Employees



To our Operational Staff



To our Suppliers



5. CONTINUOUS MONITORING

Our system is constantly growing and adapts to changes in the environment and the organization, applying actions that allow us to correct possible deviations in our processes and ensure continuous improvement.

To do this, we have various methods and tools that help us strengthen our system.



ROLES AND RESPONSIBILITIES

All members of our organization contribute to the success of our Anti-Bribery and Other Crimes Management System (SGAD). We are committed to promoting and strengthening our culture of integrity, transparency, compliance and zero tolerance for corruption.



CULTURE OF INTEGRITY, TRANSPARENCY, COMPLIANCE AND ZERO TOLERANCE AGAINST CORRUPTION AND OTHER CRIMES



ISO 37001 - ANTI-BRIBERY MANAGEMENT SYSTEM

At ACEROS AREQUIPA, we reaffirm our commitment to the prevention and rejection of any suspicion or act of fraud and corruption within our organization, operating transparently and responsibly throughout our value chain

In 2023, we obtained ISO 37001 CERTIFICATION



Funcionalidades BALSC

Ensuring our commitment to



ZERO TOLERANCE TO CORRUPTION

Preventing corrupt practices both within the organization and in relationships with third parties.



LEGAL FRAMEWORK COMPLIANCE

Complying with laws and regulations related to bribery and corruption across all our activities



CULTURE OF INTEGRITY

Commitment to ethics and integrity, enhancing our reputation, trust, and relationships with our stakeholders.



COMPETITIVENESS

Increasing business opportunities and enhancing the competitiveness of the organization.



OPERATIONAL EFFICIENCY

Improving operational efficiency by establishing clear processes and robust procedures to prevent, detect, and address cases of bribery.





ANTI-BRIBERY AND OTHER CRIMES MANAGEMENT SYSTEM