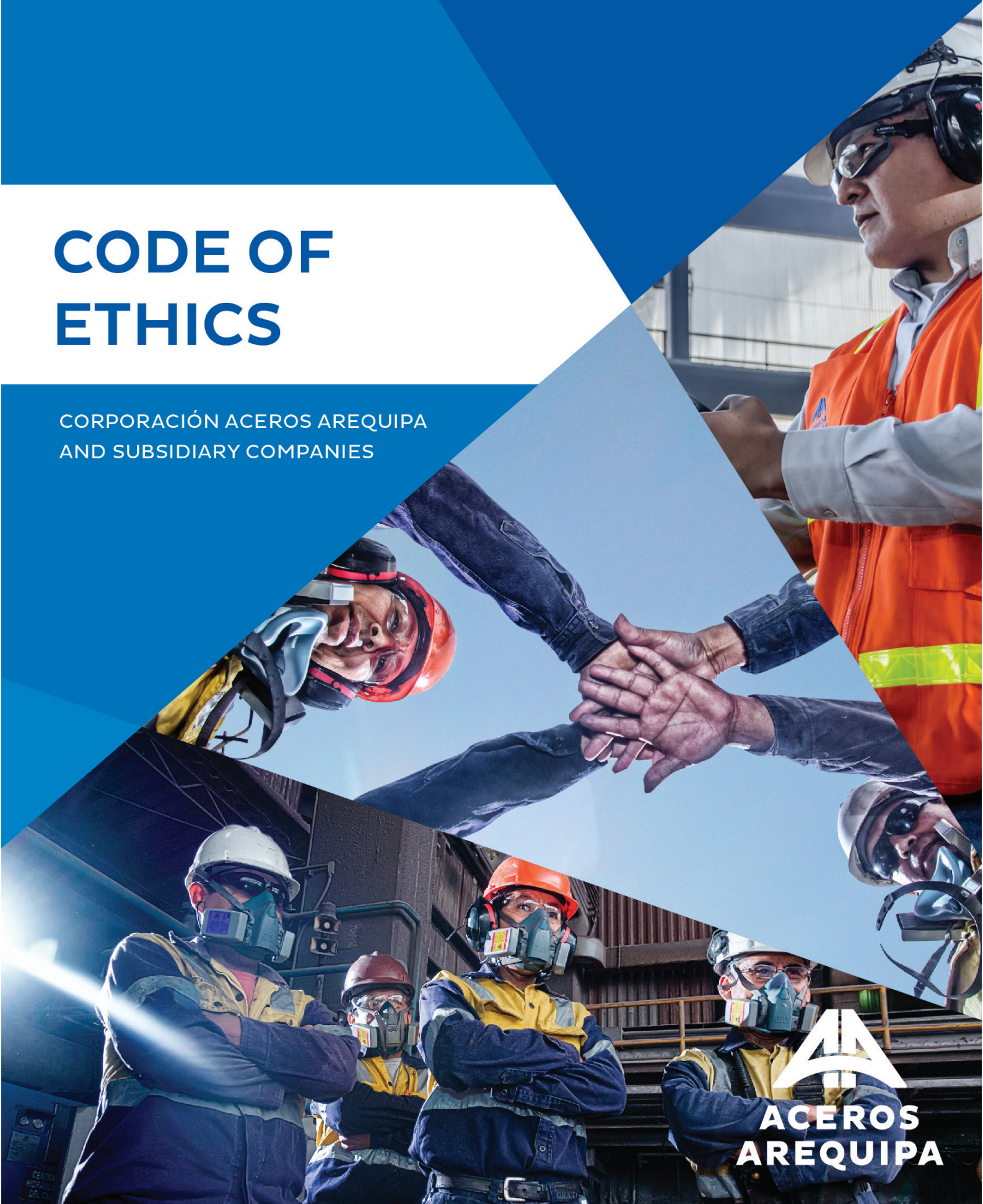


CODE OF ETHICS

CORPORACIÓN ACEROS AREQUIPA
AND SUBSIDIARY COMPANIES




**ACEROS
AREQUIPA**

LETTER FROM THE CHAIRMAN OF THE BOARD

Corporación Aceros Arequipa S.A. (henceforth CAASA) and its subsidiaries are advancing towards a set of demanding and ambitious goals, developing their practices in diverse, challenging and novel contexts that demand framing and supporting their decisions with the most solid set of values. In order to do so, we have a Code of Ethics that shows the philosophy and principles that govern us and that distinguish CAASA as a leader in its industry, known for their sustainability, friendly, socially responsible policies, that promotes the growth of the steel business and the contribution to the sustainable development of the country.

We intend that the principles contained in the Code of Ethics serve as guidelines for companies and their stakeholders, including employees, shareholders, suppliers, customers, the community, and the authorities.

It is important to keep in mind that ethics is fundamental for the development of CAASA and its subsidiaries over time and in the consolidation of a successful trajectory, based on the respect we owe to all those with whom we interact.

Every person has the right to be treated with dignity and respect. However, every right carries with it a responsibility; therefore, we make clear the conduct that all of us who belong to CAASA and its subsidiaries must follow to ensure that everyone is treated with dignity and respect.

We invite you to report any situation that goes against the principles contained in our Code of Ethics through the Ethics Line. It should be noted that this information will be handled with appropriate confidentiality and that CAASA does not tolerate retaliation.

I am sure that we will fully adhere to the practice of this Code of Ethics, because in this way we will be honoring the history of our company and strengthening the values that sustain it and guide our behavior.



Ricardo Cilloniz Champín
CHAIRMAN OF THE BOARD

Executive Summary of the Code of Ethics

How do we behave towards our stakeholders?

With our Shareholders

- We treat all our shareholders equally, with no preferences of any kind, and keep them informed of our performance in a timely and transparent manner.

Among us, the Employees

- We work in a safe environment based on respect and free from discrimination, violence, or intimidating actions.
- We guarantee equal opportunities and are committed to providing the means to help employees in their professional and personal development.
- We respect, maintain, and adequately protect the privacy and/or confidentiality of information of our colleagues, suppliers, customers, and our company.
- We do not commit criminal acts such as the payment or receipt of bribes; money laundering or terrorist financing; or the misuse or improper sale of our company's assets.
- We act fairly and always separate our personal interests from the interests of the company in business relationships.

With our Clients and Suppliers

- We demand from our suppliers the knowledge and acceptance of our ethical principles and the rigorous fulfillment of all the current legislation.
- We do not give or accept gifts, courses or invitations from customers, competitors or suppliers of goods or services that are intended to influence our business decisions.
- We undertake to keep confidential any information of our customers or suppliers, except that which must be provided by law or court order.
- We know the identity of the customers and suppliers with whom we do business and adhere to applicable anti-money laundering and anti-terrorist financing regulations.
- We are committed to guarantee and maintain quality standards of our products and maintain an attitude of service that is reflected in the delivery of our products as agreed, on time and considering the needs of our customers

With the State

- We comply with all the laws, rules, and regulations in force in the country, respecting the instances of the legal system of Peru and the country where our subsidiaries operate.

With Society

- We maintain a respectful behavior and an attitude of dialogue with society, especially with the communities located around our operations.

- We conduct all our operations within a framework of respect and promotion of human rights recognized by national legislation and global initiatives.

With the Environment

- In accordance with the nature of the steel business in which CAASA operates, we respect and abide by the norms, laws and provisions on environmental matters that constitute the legal system in force in Peru and in each country in which we have a presence; the covenants, agreements and treaties and any voluntary commitments that we may enter into; and
- We are committed to the promotion of environmental policies based on sustainable development, reconciling economic well-being, that of natural resources and that of society.

STRUCTURE OF THE CODE OF ETHICS

PRINCIPLES GOVERNING ETHICAL CONDUCT.....	10
VALUES	11
ATTRIBUTES.....	11
COMMUNICATE UNETHICAL ACTIONS.....	12
SECTION I: OF SHAREHOLDERS.....	13
Equal treatment.....	13
Disclosure of information.....	13
SECTION II: OF THE EMPLOYEES.....	14
Relationships based on equal treatment and equal opportunities.....	14
Conditions of employment	14
Rejection of harassment	15
Data Protection	15
External Communications	16
Freedom of association.....	16
Rejection of fraud and corruption	17
Use of company assets.....	17
Conflict of interest	18
SECTION III: OF THE SUPPLIERS.....	20
We maintain integral and independent relationships	20
We handle gifts appropriately.....	21
Information Management	21

SECTION IV: OF THE CLIENTS	22
Impartial Relationships	22
Information Management	22
Knowledge of the client's identity	23
Confidentiality	23
Service Attitude	23
SECTION V: OF THE STATE	24
Compliance with laws, rules and regulations	24
Cooperation and transparency	24
Rejection of corruption	25
Information and relationship with the State....	25
Tax Return Policy	25
InternationalCommerce.....	25
SECTION VI: OF THE COMPANY.....	26
Relationships based on respect and recognition.....	26
We respect human rights	26
Sponsorship of political organizations.....	27
Intervention in external events	27
Relations with competitors	28
SECTION VII: OF THE ENVIRONMENT.....	29
SECTION VIII: MANDATORY NATURE.....	30
SECTION IX: ADMINISTRATION AND MONITORING	31
SECTION X: VALIDITY	31

PRINCIPLES GOVERNING ETHICAL CONDUCT

The purpose of this Code of Ethics is to serve as a frame of reference for our directors, managers, employees, suppliers, and clients, both for CAASA and for its subsidiary companies. In this document you will find the general criteria for action and decision, in accordance with our values.

For this document, ethics means doing what is right, in the right way and for the right reasons. It includes both personal and professional behaviors in the development of activities in the relationship with stakeholders (Shareholders, Employees, Suppliers, Customers, State and Society).

The basic principles that govern our ethical conduct are honesty, sincerity and trust, justice, mutual respect, responsibility, and accountability.



VALUES

Our values help us identify what we want to be and do, sustain our trust and credibility, and guide our behavior and the way we want to be recognized.

Our values are: :

- Passion for work.
- Focus on what is relevant.
- Work as a team.

ATTRIBUTES

Our values are accompanied by attributes or qualities that support and strengthen actions related to ethics, and facilitate compliance and experience within companies:

Transparency: Act in a reliable, accessible, clear, and honest manner.

Reciprocity: Respect for the dignity of the other, with whom companies interact in an environment of mutual recognition of the obligations and rights of the parties involved.

Fulfillment: Obligation to carry out what has been promised and to observe the parameters, policies, and standards of the organization.

Commitment: Duty of the directors, managers, and employees to fulfill the responsibilities, oriented to the development of the Vision and Mission and to the achievement of the strategic objectives of the companies. It implies carrying out with care and dedication the tasks and duties that are proper to it.

COMMUNICATE UNETHICAL ACTIONS

Communicating when an unethical action is observed, or when there is uncertainty or doubt, demonstrates our integrity and courage to do what is right; it also contributes to the prevention of misconduct and mistakes. Therefore, our directors, managers, employees, suppliers, clients, or any other interest group may communicate real facts or uncertainties about compliance with this Code of Ethics. To do so, we must use the channels defined in the Aceros Arequipa Ethical Line (<http://www.acerosarequipa.com/etica-y-gestion-social/linea-etica.html>), whether or not anonymously.

We do not tolerate punishments, sanctions, or intimidation for reporting actual facts or concerns in good faith, as they are a serious form of inappropriate conduct.

SECTION I: OF SHAREHOLDERS

Equal treatment

Each of our shareholders, regardless of the number of shares they represent, will receive equal treatment, guaranteeing the exercise of their rights to raise concerns, petitions, complaints, or grievances. It is a duty to have good practice of Corporate Governance in place to ensure the development of the best management processes, aimed at generating value from investments as well as ethical business integrity.

Disclosure of information

We are committed to good practices of corporate governance that increase value by keeping the market informed of our performance and by providing timely and transparent accountability. The information disclosed must not affect the rights of third parties or represent a risk to shareholders' investments or to the continuity of companies.

SECTION II: OF THE EMPLOYEES

Relationships based on equal treatment and equal opportunities

We promote equitable treatment in relation to access to employment and adequate working conditions. We do not tolerate any discriminatory treatment based on gender, race, color, nationality, social origin, ethnic origin, age, marital status, sexual orientation, ideology, political opinions, religion or any other personal condition likely to be a source of physical or social discrimination against its directors, managers and employees.

We guarantee equal opportunities and resources to help employees in their professional and personal development.

Conditions of employment

We promote a work environment based on respect, offering its managers and employees a safe environment, in which the risks



that threaten their safety and health are properly managed and internalized by each one of them. We also require our suppliers to comply with legal provisions on working conditions, safety, and occupational health. We promote a work environment where there is no place for manifestations of violence, physical, sexual, psychological, moral or any other type of harassment, as well as abuse of authority at work or other conduct that generates an intimidating or offensive environment for the personal rights of its directors, managers or employees.

Rejection of harassment

We promote a work environment where there is no place for manifestations of violence, physical, sexual, psychological, moral or any other type of harassment, as well as abuse of authority at work or other conduct that generates an intimidating or offensive environment for the personal rights of its directors, managers or employees.

Data Protection

We respect, maintain, and adequately protect the privacy of our directors, managers, and employees, as well as personal information required by companies to comply with the Law. In the same way, each one of us, regardless of the hierarchy, is responsible for not disclosing strategic or confidential information to which they have access due to the functions we perform.

External Communications

We must ensure that our external communications (including online messages, social networks, blogs, forums and social media) do not disclose confidential proprietary information or represent (or give the impression) that they are speaking on behalf of CAASA and Subsidiaries unless authorized to do so by the Company. The same applies to communications with the press.

Similarly, we should think carefully before making any publication in our personal social networks, considering before publishing, if what we have written or are sending does not disclose confidential information of our company.

Freedom of association

We recognize the right of free association of our employees (unions and pacts), we respect their participation in any type of collective bargaining, and we do not practice any type of



discrimination towards them linked to these associations.

Rejection of fraud and corruption

We reject any type of fraud and corruption that may be committed:

- There is no justification for undermining the ethical conduct of public officials or the owners or employees of other companies; we do not do so or permit it. Therefore, we also require our suppliers not to do so.
- We do not tolerate or justify acts of bribery. Bribery is the offering of gifts, loans, fees, gratuities, or any other benefit to any person, as an incentive to act contrary to their legitimate and correct interests.

-

Use of company assets

We have within our reach the resources and means required to carry out labor activities and comply with the adequate performance of the processes, according to the needs of the position.

We are committed to using the assets, facilities and resources that CAASA and its subsidiaries have in order to comply with the established work purposes, preventing them from being used directly or indirectly for our own benefit or for the benefit of third parties, or that serve to promote actions that may cause them harm.

Conflict of interest

We will not enter into contracts or negotiations in which a conflict of interest is involved; the same applies to our spouses or common-law partners, and our relatives, up to the fourth degree of consanguinity, second degree of affinity, or first civil¹.

The conflict of interests materializes when, due to their functions, the director, manager or collaborator, when making a decision or performing or omitting an action, must choose between his personal interest and the well-being of the Company, client or supplier, generating with his decision, action or omission an undue benefit that he would not receive otherwise.

This type of conflict ignores legal, contractual, statutory, or ethical duties. For this conflict to be configured, it is not necessary that the interests of CAASA and subsidiaries and those of the director, manager or collaborator are opposed, it is enough that they coexist.



When faced with conflicts of interest, our actions should be governed by the following principles:

- **Loyalty:** we must always act with loyalty to CAASA and its subsidiaries and its shareholders, regardless of our own interests or those of others.
- **Abstention:** we must refrain from intervening or influencing decisions that may affect companies, persons, or entities with which there is a conflict.
- **Confidentiality:** if we find ourselves in a situation of conflict of interest, we must refrain from accessing or disclosing information classified as confidential that affects the conflict.
- **Information:** if you have any doubt about this type of conflict or if you are currently involved in a conflict of interest, you must inform your immediate supervisor and the Ethics Committee about them, in writing. In the case of our directors, they must first report to the Audit and Risk Committee and then the Audit and Risk Committee will report to the Board of Directors.

¹ **Relationship by blood:** First degree parents and children / Second degree siblings, grandparents and grandchildren / Third degree uncles, aunts, nephews and nieces / Fourth degree first cousins.

Relationship by affinity: First degree in-laws, sons-in-law, step-parents and step-children/Second degree brothers-in-law and sisters-in-law.

y First Grade: Adoptive Parents and Adoptive Children

SECTION III: OF THE SUPPLIERS

We maintain integral and independent relationships

Therefore, we:

- Foster relationships with suppliers based on mutual respect, fairness, and transparency, avoiding any kind of fraudulent treatment.
- Demand from our suppliers the knowledge and acceptance of our ethical principles, strict compliance with all current legislation and environmental standards, occupational health and safety. As well as respect for human rights and socially responsible practices.



We handle gifts appropriately.

Therefore, we:

- Do not give or accept gifts, presents, courses or entertainment from customers, competitors or suppliers of goods or services, including banking and insurance services, that may inappropriately influence a business decision or relationship.
- Inform the Aceros Arequipa Ethical Line about suppliers, customers or any other person or organization that has offered gifts or presents or any other benefit the purpose of which was to improperly influence a business decision or relationship.

Information Management

We provide our suppliers or contractors with only such information as is necessary for pre-contractual or follow-up relationships, on equitable terms.

We commit ourselves to maintain in confidentiality any information of the supplier, except the one that must be given by legal disposition or judicial order, including the relative to its operations and businesses, products and services, marks, methods, systems, business plans or methods of marketing and strategies, cost and financial information of its proposals; or any document and/or electronic means considered as confidential by the supplier.

We do not consider as confidential any public information, or information that has been shared with us as part of our objective supplier selection processes.

SECTION IV: OF THE CLIENTS

Impartial Relationships

We promote a respectful and impartial relationship with our clients based on the recognition of their rights and needs.

Information Management

We are committed to maintaining clear, transparent, and balanced communication with our customers. We conduct our business in an honest and transparent manner, avoiding misleading information about agreed terms in contracts or through our marketing communications.



Knowledge of the client's identity

We know the identity of our customers and suppliers with whom we do business and adhere to applicable anti-money laundering and anti-terrorist financing regulations. When we suspect criminal behavior, we take appropriate action. We do not engage in any activity or engage in counterfeit products or provide products of a different quantity or quality than those invoiced that cause customers to violate applicable laws or regulations.

Confidentiality

We watch over the confidentiality of our clients' information. We commit ourselves not to reveal information of our clients to third parties, except consent of the client or in fulfillment of legal obligation.

Service Attitude

We are committed to guaranteeing and maintaining quality and safety standards for our products. We also commit ourselves to guarantee and maintain an attitude of service that is reflected in the delivery of our products as agreed, on time and considering the needs of our customers. We are also committed to preserve with our customers the channels and relationship mechanisms that allow us to receive their needs and perceptions about our products.

SECCIÓN V: DEL ESTADO

Compliance with laws, rules, and regulations

We comply with all the laws, rules, and regulations in force in the country, respecting the instances of the legal system of Peru and the country where our subsidiaries operate.

Cooperation and transparency

We maintain relations with authorities, regulatory bodies, and other State institutions, based on principles of cooperation and transparency.

Rejection of corruption

We reject all types of practices denoted as corruption. In this sense, under no pretext is it accepted that our directors, managers, employees, suppliers or any other entity with which



we have commercial relations (such as joint ventures) grant or receive bribes. We promote knowledge of the truth in the face of internal or external allegations of corruption and provide resources and information if an investigation is necessary.

Information and relationship with the State

We maintain stable channels of communication with local, regional, and national public authorities to respond to formal requests for information. We are also accountable to these institutions where appropriate.

Faced with any situation, our actions as part of CAASA and subsidiaries must represent their legitimate interests and position as an organization, in a transparent, rigorous, and consistent manner.

Tax Declaration Policy

We are responsible taxpayers. We manage all our tax declarations accurately, in good faith and on a timely basis.

International Commerce

We must faithfully comply with all applicable laws governing imports, exports and doing business with entities outside the country's borders. These laws contain limits on the types of products that can be imported and the means of import.

SECTION VI: OF THE COMPANY

Relationships based on respect and recognition

We maintain a respectful behavior, and an attitude of dialogue with the Society, especially with our operations located close to the local communities, with the purpose of achieving common interests and preventing possible situations of conflict and risk.

We identify specific actions with representative groups of the Company, and encourage dialogue, using specific spaces and established channels.

We respect human rights

Therefore,

- We conduct all our operations within a framework of respect and promotion of human rights recognized by national



legislation and global initiatives.

- We refuse to allow any of our interest groups to carry out directly or act as accomplices in practices that violate human rights; we also refuse any type of payment intended to pay for illegal armed groups, contribute to terrorism, money laundering or the commission of any criminal act.
- We categorically reject child labor or any form of forced labor and are committed to making this position known to its stakeholders, especially suppliers and contractors. s.

Sponsorship of political organizations

We do not finance or promote political parties, their representatives, or candidates, nor do we sponsor congresses or activities aimed at political propaganda. Therefore, directors, managers or employees may not use for such purposes, assets, or resources of companies.

Intervention in external events

In order for a director, manager or collaborator to participate on behalf of CAASA and subsidiaries in conferences or other similar public events, he or she must have written permission from the General Manager or the Chairman of the Executive Board, as appropriate, who will define the relevance or otherwise of the intervention and the information to be used in the events or public events.

Relations with competitors

We maintain honest, constructive, and ideal relationships with our competitors. This implies, among other commitments:

- Compete in markets fairly, without misleading or denigrating advertising of your competitors or third parties.
- • Obtain information from the competition, always in a legal manner.
- Comply with antitrust regulations, avoiding any conduct that constitutes or may constitute collusion, abuse, or restriction of competition.
- We will make independent pricing and marketing decisions and will not cooperate or coordinate our activities with our competitors.
- We will not offer or solicit improper payments in connection with the purchase of our goods or services, or the sale of our



products or services, nor will we participate in or assist in obstructions or threats to private customers.

SECTION VII: OF THE ENVIRONMENT

In accordance with the nature of the steel business in which CAASA develops:

- We are committed to carrying out a business management that allows us to carry out our operations within the framework of our commitment and compliance with caring for the environment.
- We respect and abide by the norms, laws and provisions on environmental matters that make up the legal system in force in Peru and in each country where we have a presence; agreements and treaties and any voluntary commitments we could make.
- We are committed to the promotion of environmental policies based on sustainable development, reconciling economic well-being, that of natural resources and that of societ

SECTION VIII: MANDATORY NATURE

All directors, managers, employees, suppliers, and any other entity with which we have business relationships (such as joint ventures) agree to comply with this Code of Ethics of CAASA and its subsidiaries.

This Code of Ethics provides general criteria and guidance for the conduct of directors, managers, employees, suppliers, and customers, but each person is ultimately responsible for his or her actions or omissions.

This Code does not include all the rules or regulations that apply to each situation. Its contents must be considered in conjunction with the policies, codes, regulations, practices, and procedures of CAASA and subsidiaries, and with the requirements of the Law.



However, even when a situation lacks a specific guideline, the director, manager, employee, supplier, or customer is expected to apply ethical principles.

SECTION IX: ADMINISTRATION AND MONITORING

The guidelines and declarations defined in this Code for each stakeholder group will be administered by the managers whose processes are related to the attention to Shareholders, Employees, Suppliers, Clients, State and Society.

Compliance with the Code of Ethics is supervised by the General Manager, who may formally delegate functions and authority to an Ethics Committee that will act according to the provisions of its regulations. Periodically, the Audit and Risk Committee of the Board of Directors will be informed of all identified ethical breaches.

SECTION X: VALIDITY

This Code was initially approved by the Board of Directors of Corporación Aceros Arequipa S. A. on June 25, 2015, and amended on October 26, 2017. This code is effective from the date of its approval.

