

## FREE COMPETITION POLICY

At Austral Group S.A.A. (hereinafter Austral) we have committed to fairly compete in all our operations and not to participate in practices that restrict directly or indirectly free competition in the market.

We guarantee and encourage our economic activities in a fairly and ethical manner respecting the highest standards of compliance with Free Competition regulations for the benefit of consumers. Compliance with Legislative Decree No. 1034 that approves the Law for the Repression of Anticompetitive Conduct (Free Competition Law) is part of our Good Corporate Governance commitments.

Our risk management process allows us to identify, evaluate, control and monitor risks associated with Free Competition to avoid illegal and unethical acts, as well as reinforce good practices on this matter. We have a risk matrix on Free Competition, which is periodically reviewed and updated.

We consider conduct that violates Free Competition, the abuse of a dominant position and horizontal and vertical collusive practices, as well as any other behavior determined by national regulations.

Our commitment and compliance with this policy is applicable to Austral' s interaction with its competitors, clients, suppliers, trade associations, workers and the State.

Our senior management, directors, executives and workers in general are fully aware of the legal responsibilities that Austral could assume in the event of non-compliance with this policy, therefore, they must not commit any act that violates the Free Competition regulations or other regulations, corporate policies, manuals, codes, and procedures related. By virtue of this, this policy and other documents derived from it are mandatory.

All our workers participate on a mandatory basis in the dissemination activities and training on Free Competition that are programmed by Austral.

The Compliance Officer designated by the Board of Directors is the person in charge of developing, monitoring and implementing the compliance program regarding Free Competition in accordance with the corresponding regulations.

Any violation or possible violation of the Free Competition Policy or in general of any internal policy of Austral, must be reported to the Compliance Officer immediately via the complaints channel: [valores@austral.com.pe](mailto:valores@austral.com.pe), cellphone number 946020784 and the ethics line web portal <https://etica.ext.austral.com.pe>. Likewise, the Compliance Officer will also act as a consultation window for any questions.

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If a worker violates the Free Competition Law, this policy and other related internal regulations; Austral will impose the corresponding sanctions after having considered different aspects of the violating acts, the degree of participation and all other circumstances. No non-compliance will be tolerated.

## Definitions

- **Free competition:** market situation in which any person or company is free to participate in a certain economic activity, in which consumers have the freedom to choose what products or services to purchase and through whom to obtain them without restrictions.
- **Abuse of dominant position:** Conduct through which a company that holds a dominant position in the relevant market uses this position to improperly restrict competition, obtaining benefits and harming real or potential, direct or indirect, competitors not being possible if he would have not held certain position.
- **Horizontal collusive practices:** Agreements, decisions, recommendations, or concerted practices carried out by competing companies that have the object or effect of restricting, preventing or distorting free competition, such as: the concerted fixing, directly or indirectly, of prices. or other commercial or service conditions; the concerted distribution of clients, suppliers or geographical areas; the coordination or coordination of offers, positions or abstentions in State selection procedures, public or private contests or other forms of public contracting or acquisition provided for in the pertinent legislation, as well as in public auctions and auctions; among others.
- **Vertical collusive practices:** Agreements, decisions, recommendations or concerted practices made by companies that operate at levels other than the production, distribution, or marketing chain, which have the purpose or effect of restricting, preventing, or distorting free competition.
- **Compliance Officer:** The official in charge of developing, monitoring, and implementing the compliance program regarding free competition.

**Approved by the Austral Group S.A.A. Board of Directors**

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