

## INTEGRATED MANAGEMENT POLICY

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## 1. OBJECTIVE

The object of this manual is to establish the guidelines and policies for those associates and interested parties that impact or who are part of the management systems of Corporación Aceros de Guatemala.

## 2. DEVELOPMENT

Corporación AG expresses its firm intention to work for the Sustainable Development and Growth of the Corporation, and acknowledges that ***profitable growth, market value, excellence in processes and people, and sustainability*** are strategic principles obtained through industrial safety and occupational health, antibribery, environmental, corporate social responsibility, and quality management systems.

Accordingly, in AG we are committed to operate the management systems according to the following principles:

1. To fulfill our purpose: “We transform the present to build the future we all dream about”.
2. To promote and provide working conditions that comply with the requirements of the management systems comprehensively applied in the Corporation by providing our associates, clients, or any third parties accessible complaint channels that are confidential, anonymous, and free from retaliation, discrimination, or disciplinary measures to those who might have information or knowledge of any activity related with the commission or participation in crimes or ethical violations.

To that effect, the Corporation has the following exclusive channels for all kinds of Complaints and/or communications:

- Webpage: [www.etictel.com/ag](http://www.etictel.com/ag);
  - E-mail: [codigoeticaag@etictel.com](mailto:codigoeticaag@etictel.com); and
  - Telephone line: **+502 2470 - 8616**
3. To comply with internal standards, relevant national and international regulations, and legal provisions applicable to the processes handled by the Corporation, as well as to establish controls to reduce social risks.
  4. To identify dangers and to evaluate and manage risks and impacts associated with the operations and activities of the Corporation and the following management systems: quality, antibribery, industrial health and safety, environment, and corporate social responsibility.
  5. To promote the continuous improvement of our management systems, providing the resources considered necessary to strengthen and achieve our strategic objectives; to make an emphasis in the investigation of all the complaints made derived from failures in the systems.

6. To strengthen the culture in which employees understand and assume their role and promote health and safety, the protection of the environment, including pollution prevention, have zero-tolerance to bribery, and meet the quality of products and services with a responsible and committed result-oriented leadership, with socially responsible practices.
7. To work with a result-oriented approach, by meeting strategic goals with competent and trained human resources.
8. To inform the performance of the organization to the corresponding interested parties through Crucially Important Goals (MCI Spanish Acronym) and SIG indicators, keeping an open and transparent relationship, when applicable.
9. To appoint an internal staff member of the Corporation, named the Compliance Officer, who will have the competences, position, authority, and independence required to ensure full compliance of the antibribery management system and the elements described in Chapter No. 6 of the Anti-bribery Management System Manual.  
This person is responsible for the design, implementation, follow-up and continuous improvement, advice and guidance to the personnel and the corresponding interested parties, and to provide information regarding the performance of the system to the Corporate Bodies and General Management.
10. To delegate the authority and responsibility to the directors to request that the requirements set for the antibribery management system are applied and enforced in their departments or positions. In the event of non-compliance, the sanctions described in Chapter No. 6 of the Anti-bribery Management System Manual must be applied.
11. Review and disseminate the corporate management so that associates know and understand it.
12. To promote the consultation and participation of the employees by providing the mechanisms, tools and necessary resources for the development and improvements to the health and safety system at the work place.