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		Version: 02
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## 1. **BACKGROUND**

IPESA SAC (hereinafter "IPESA") promotes a culture based on permanent values. These values, in turn, inspire a code of ethics to which all its employees must adhere and which must govern their relationships with the community, customers, suppliers and colleagues within the company.

## 2. **MISSION:**

**Inspire** our employees, **empower** our clients and **multiply** results.

## 3. **VISION:**

**Transforming** potential into opportunities.


## 4. Our **VALUES** are:

- Proactivity
- Commitment
- Responsibility



## 5. **SCOPE OF APPLICATION**

- Law No. 29733: "Personal Data Protection Law"
- Law No. 30222: "Law on Safety and Health at Work"
- Supreme Decree No. 012-2014-TR: "Supreme Decree approving the Single Registry of Information on work accidents, dangerous incidents and occupational diseases and amending Article 110 of the Regulations of the Law on Safety and Health at Work"
- Criminal Code related to "Fraud in the Administration of Legal Entities"
- Legislative Decree No. 1385: "Punishing corruption in the private sector"
- Regulation of Law No. 27942: "Law on the Prevention and Punishment of Sexual Harassment"
- Consolidated Text of Legislative Decree No. 728: "Law on Productivity and Labor Competitiveness", approved by Supreme Decree No. 003-97-TR
- International Standard on Auditing 240: "The auditor's responsibility to consider fraud and error in an audit of financial statements"
- Statement on Auditing Standard 99: "Considering Fraud in an Audit of Financial Statements" - October 2002
- Among others related to the topics involved in this code.

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## 6. **ANTI-BRIBERY POLICY**

All IPESA employees declare that they are committed to the fight against acts of bribery.

IPESA develops an inclusive internal culture based on compliance with our corporate values, mutual trust among its members and interactions with its external stakeholders.

- It does not practice or tolerate actions that are detrimental to mutual interests or that condition negotiations of any kind.
- We reject actions that allow bribery in any form and guarantee transparency in each of our business activities.

In this regard, IPESA has decided to direct its resources towards the implementation of an Anti-Bribery Management System with the aim of transparent management based on directives and commitments. More information can be found in ***IPESA's Anti-Bribery Policy***.

## 7. **RULES OF CONDUCT**

This Code of Ethics applies to IPESA's internal, external and subcontracted collaborators at the corporate level, as indicated in this document.

The collaborator who provides services to IPESA will adapt his/her actions to the principles of Ethical Conduct and Conduct.

### 7.1 **RULES OF CONDUCT WITH THE COMMUNITY**

#### 7.1.1 **COMPLIANCE WITH LAWS AND REGULATIONS**

IPESA employees must respect and obey all policies, regulations and laws that apply to the company's business, including internal and external policies, regulations, relevant local and international laws. It is the responsibility of each IPESA employee to know, understand and comply with said policies, regulations, laws and any other regulatory requirements, whether in Peru or abroad, to be applied within the framework of their responsibilities.


#### 7.1.2 **ENVIRONMENT, HEALTH AND SAFETY AT WORK**

IPESA employees are obliged to ensure the conservation of the environment, assuming an active and responsible commitment during the execution of their work. The company will provide employees with the necessary safety equipment or implements when the nature of the work so requires. These implements will be used by the employee in accordance with the instructions received. During daily work, IPESA employees are obliged to protect themselves, their coworkers and the company's facilities against all kinds of accidents and risks inherent to the sector. To this end, IPESA employees are obliged to observe and comply with all safety regulations established by law and by the company.

Any work accident, no matter how minor (even if it does not cause any injury) must be immediately reported to the designated persons, who must issue a report and/or work accident report, in order to issue the relevant instructions that the case requires and the immediate corrective measures in order to prevent future similar accidents.

#### **The following will not be accepted:**

- Actions or threats that disrupt the proper functioning of the company or put employees and visitors at risk and in danger in any of the premises nationwide where company activities are carried out.
- Failure to comply with the company's health and safety regulations will be considered a disciplinary offence, subject to sanctions including dismissal. In any case, safety will have priority in any activity where conflict arises.

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Likewise, IPESA employees accept that the company may inspect at any time and without prior request any property owned by employees that they use to store their personal belongings, including desks, lockers, vehicles, etc.

### 7.1.3 SOCIAL RESPONSIBILITY

IPESA employees are aware that the company recognises all the interest groups that surround it: community, clients, employees, shareholders, suppliers, government and the environment, and seeks to ensure that the development of its activity can contribute to its area of operation and not harm any of them.

The company must behave as a responsible citizen, capable of anticipating the needs of society. For this reason, IPESA employees, both at the main headquarters and at their offices nationwide, promote the development of activities in the communities around them, collaborate with government agencies when requested and improve processes to have the least possible impact on the environment.

## 7.2 RULES OF CONDUCT WITH THE ORGANIZATION

### 7.2.1 EQUAL OPPORTUNITIES AND NON-DISCRIMINATORY TREATMENT

The company provides equal opportunities to all its employees, with their own effort and personal development being a determining factor. The company does not tolerate any discriminatory treatment or harassment anywhere, whether inside or outside the workplace, and seeks to avoid actions or behaviors that are or may be considered harassment. All employees must, therefore, conduct themselves in an upright manner in their work, aware of the actions or behaviors that may be acceptable in one culture, but not in another.

IPESA employees have the right to work in an environment in which people are treated with respect. For IPESA, respect for people is a responsibility and extends to both the relationships between employees (regardless of their position in the company) and the relationships of employees with clients, suppliers, collaborators and other interest groups. All employees must contribute to guaranteeing a work environment in which the dignity of people is respected.

IPESA employees are aware of and participate in the good working environment that the company provides, and will therefore do everything possible to maintain an excellent organizational climate, harmony among all employees and harmonious and cooperative interrelationships between the different areas of the company.

### 7.2.2 COMPLIANCE WITH COMPANY OBJECTIVES

IPESA employees confirm their commitment to prioritising company objectives over individual objectives or those of their own work units.


### 7.2.3 CONFLICT OF INTEREST

IPESA collaborators must act by giving priority to the interests of the company over personal or third-party interests that could influence their decisions, actions, personnel contracts, services and advice provided on behalf of IPESA. **They must also refrain from :**

- Influencing, for one's own benefit or that of third parties, those decisions that could be related to business, personnel contracts, companies and/or professional activities of any kind in which, directly or indirectly, one participates or has a personal interest.

Likewise, IPESA employees have the responsibility to report any conflict of interest that they witness, as well as suspicions or acts of bribery, through the channels provided or by means of Conflict of Interest Affidavit forms signed by IPESA employees.

### 7.2.4 DUTY OF LOYALTY AND NEGOTIATIONS IN GOOD FAITH

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IPESA employees must at all times adjust their actions to the principles of loyalty and good faith towards the company, their superiors, suppliers, clients, collaborators and interested users, with respect to third parties with whom they interact.

#### 7.2.5 SALES, MARKETING AND PROPER BUSINESS MANAGEMENT

IPESA collaborators must be based on efficiency, professionalism, service mentality and collaboration; seeking the maximum satisfaction of our clients, providing them with competitive and quality solutions. A friendly, courteous and service-oriented approach must prevail. The information provided to clients must be clear and correct, channeling requests and complaints through formal channels .

IPESA employees will adhere to the highest standards of integrity in all of the company's business activities, carrying them out in an honest and equitable manner.

**It is not acceptable :**

- Transmit deliberately misleading messages.
- Omit important facts.
- Making false claims about our competitors' offerings.
- Having personal interests or representing the interests of related third parties that may interfere with or be contrary to the **interests of the company**, or that influence the independence of its decisions, or that lead it to show unjustified preferences.
- Act in a biased and non-objective manner.

#### 7.2.6 RELATIONS WITH THE MEDIA

IPESA employees will refrain from providing information to the media, except in those circumstances in which there is an express indication from the company's senior management and will be informed about any relevant matter of local, national and international interest related to the company's commercial activities and business. Therefore, **they will not issue** :

- Value judgments that adversely affect the company's image.
- Personal comments or opinions to third parties on social, religious, political, ethnic, etc. issues; while the employee is engaged in company-related activities


#### 7.2.7 HANDLING CONFIDENTIAL INFORMATION

IPESA employees have access to information that is not public knowledge, and therefore must maintain confidentiality unless the disclosure of information is required by law or court order. This obligation does not end when their employment relationship ends. Discretion is also required with all types of company information in general and communications that may be susceptible to being intercepted by third parties must be avoided .

Therefore, the IPESA collaborator **will not reveal** :

- Information related to confidential matters to unauthorized persons inside or outside the organization unless authorized by Senior Management.
- Confidential information obtained from clients, suppliers and others in general, in the course of activities, will be kept confidential as if it were one's own.

In the event of any non-compliance in these situations, disciplinary measures will be taken in accordance with a regulatory framework.

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## 7.2.8 APPROPRIATE USE OF COMPANY ASSETS AND INFORMATION IN GENERAL

The company's assets, whether tangible or intangible, and its documentation and information are valuable property of the company. IPESA employees must use the tools, computers, machines, telephones, vehicles, supplies, materials and other goods or services provided by the company exclusively for tasks that are specific to their activity, and they are responsible for their proper conservation. IPESA employees acknowledge that all information, work or research carried out, including projects generated by their work during the term of their employment relationship, is the exclusive property of the company.

Likewise, the IPESA collaborator **may not**:

- Using, for personal benefit or that of related third parties, business opportunities that become known to them in the course of their activities or due to the position they hold, unless authorized by Senior Management.

IPESA employees will treat all persons with whom the company does business fairly and honestly, thereby maintaining their reputation and integrity in all their business relationships. Under ***no circumstances*** will false, fictitious, fraudulent or misleading information be provided.

## 7.2.9 USE OF TECHNOLOGICAL TOOLS

IPESA employees will make good use of technological tools such as: email, intranet, internet, chat, management systems, among others; conducting themselves appropriately and at the level of the standards of seriousness, professionalism and respect promoted by the company.

IPESA employees **must not**:

- Use technological tools for personal activities and uses that are not related to the performance of your own activities in the company, being aware that these are made available to you as work tools.

In this sense, IPESA collaborators accept that the company accesses said information to verify its proper use, expressly waiving any subsequent claim or expectation of privacy.

## 7.3 RULES OF CONDUCT WITH THIRD PARTIES

### 7.3.1 CUSTOMER RELATIONS


IPESA employees seek long-term business relationships with their clients based on service excellence. All business will be conducted within the framework of seriousness and transparency that the company seeks, and IPESA employees are prohibited from receiving information from third parties without the client's consent or from inducing, pressuring or encouraging directors, managers or employees of the client to reveal information considered confidential for their own benefit or that of the company. In carrying out their activities, IPESA employees **must not expect**:

- No special compensation from our clients.
- Nor accept any type of gifts, favors, or money under any concept or invitations from any of them, which go beyond the concept of courtesy, that is, which may affect the personal interests of users, except in those cases justified and expressly authorized by Senior Management.

This code of ethics and conduct is complemented by the ***IPESA Procedure on gifts, presents, donations, hospitality and/or invitations***.

### 7.3.2 SUPPLIER RELATIONS

The establishment of relationships with suppliers must be based on the fact that they are strategic partners of the company, so the treatment must be as equals and always within the legal framework. Likewise, **it is prohibited**:

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- Offer, give, request or receive any type of payment or collection outside the agreed contract. Likewise, the employee will not use the position of collaborator to obtain personal advantages.
- Offer, give, request or receive any type of special compensation from our suppliers, and will not accept gifts, favors or money under any concept or invitations from any of them that go beyond the concept of courtesy, that is, that may affect the personal interests of users, except in those cases justified and expressly authorized by Senior Management.

This code of ethics and conduct is complemented by the ***IPESA Procedure on gifts, presents, donations, hospitality and/or invitations.***

### 7.3.3 COMPETITION-RELATED ISSUES

IPESA employees identify with the constitutional principles of the free market. They believe in free competition and in attracting and retaining customers by offering quality products and services, competing in a fair, loyal and transparent manner, under criteria of efficiency and careful attention to the requirements and needs of customers. They will not provide information about the Organization's products and businesses to third parties, particularly those with which it competes in the different sectors in which it operates.

## 8. COMPLAINT CHANNEL

The channel for receiving complaints is located at <https://www.ipesa.com.pe/etica>, which can be accessed through the IPESA website for the general public.

This channel allows you to file a complaint directly through the website [www.ipesa.com.pe](http://www.ipesa.com.pe). The complainant enters the complaint channel and generates their complaint as indicated on the page, choosing anonymity or providing their data. Once the complaint is filed, it is automatically sent to an inbox or email: [denunciascontraloria@ipesa.com.pe](mailto:denunciascontraloria@ipesa.com.pe). You can also communicate directly to this email address, which is another complaint channel. Likewise, there is another complaint channel, the cell phone number [969 863 314](tel:969863314), so that you can communicate via WhatsApp.

Further information is provided in the ***Complaints and Raising Concerns Procedure.***


## 9. SANCTIONS

IPESA employees accept the principle that the company, in order to properly perform its duties, must establish regulations, rules and procedures, the content of which they declare to be familiar with and to which they are fully subject to compliance. IPESA employees are aware that the company may apply disciplinary measures and sanction workers who fail to comply with the rules of conduct set out in this code, in accordance with the legal provisions in force and as described in the "Internal Work Regulations".

In the event of any non-compliance in these situations, disciplinary measures will be taken in accordance with a regulatory framework.

## 10. AREAS OF CONTROL

The company will appoint an official who will be responsible for enforcing this code, who will be called "Control Areas" designated by Senior Management, and to whom the IPESA collaborator must report as soon as possible any event, situation or inappropriate conduct or conduct contrary to the provisions of this standard, being in charge of granting the authorizations referred to in this document.

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**11. CHANGE CONTROL**


No.	PREVIOUS VERSION	CURRENT VERSION	UPDATE DATE
1	01	Document Preparation	12/27/2021
2	02	Email is updated and cell phone number is included	12/27/2024



Fany Tipacti  
Chief Comptroller General Manager  
Compliance Officer



Giorgio Mosoni  
General Manager

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By this document, I, \_\_\_\_\_ identified with DNI No. \_\_\_\_\_, collaborator of the \_\_\_\_\_ area at IPESA SAC, sign in agreement to have received the training and the code of ethical conduct and Conduct, I also accept the conditions described in this document and I submit to the sanctions and/or decisions that the organization considers pertinent based on my actions.


Date:

Branch:

Post:

Signature:




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### ANNEX 1

Here are some examples of violations of the code of ethics that have been classified as minor, serious and very serious violations.

LACK	GRADUATION OF THE FAULT
Crime of money laundering	Very serious
Participating in business with the company as an independent worker and holding positions as director, executive or employee of a supplier, client or competitor that generates a conflict of interest and that is contrary to the interests of the company; unless authorized by the Compliance Officer.	Very serious
Deliberately misleading messages, omitting important facts or making false claims about competitors' offerings. Attributing different characteristics to the products they offer.	Very serious
Entering into any type of agreement with a public official, the actual or potential outcome of which may defraud the state.	Very serious
Performing acts classified as prohibited in the code of ethics and conduct, in the Crime Prevention model and/or in some type of crime.	Very serious
Acts of bribery with clients, suppliers, collaborators and/or interested parties of <b>IPESA</b> .	Very serious
Irregularities in the use and/or abuse of assets, equipment and computer applications for purposes that do not correspond to the company's work activities.	Very serious
Data manipulation and falsification.	Very serious
Appropriation of resources and/or misappropriation of funds	Very serious
Non-compliance with internal and external laws, regulations, rules and procedures that affect the interests of the company .	Serious
Failure to provide support in an investigation process	Serious
Other aspects related to non-compliance with the code of ethics or unethical, dishonest conduct that may put it in conflict with the interests of the <b>IPESA company</b> .	Serious
Do not attend mandatory training sessions organized by the company, unless you have authorization from your immediate supervisor.	Mild

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- a) The application of disciplinary measures will follow the established regular procedure, and the following levels of communication must be respected:
  - I. Immediate boss, Comptroller's Office
  - II. General Management.
- b) Sanctions will be applied according to the nature of the violation, its severity and the employee's background.
  - I. Prior to applying the sanction, the Manager must know the details of the occurrence and the employee's background.
- c) In all cases, sanctions range from verbal or written sanctions and the application of sanctions must be communicated to Human Resources, using the respective format ( Via email and Memorandum ), which will be included in the employee's file.
- d) Both suspension from work without pay and dismissal will be sanctions that must be approved by Senior Management.