

INTEGRITY CODE



**INTEGRITY
SYSTEM**



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INTEGRITY CODE OF PETROPERÚ

MESSAGE FROM THE CHAIRMAN OF THE BOARD

Dear Colleagues,

The reputation of PETROPERÚ S.A. is a consequence of the mission, vision, work and commitment of those of us who work to achieve what we are today: the most important oil company in Peru.

It is our values, actions and decisions that define us, and this is how the importance of committing ourselves to responsible compliance with our Code of Integrity and related regulations arises.

The Integrity Code is part of our business culture, which should guide our behavior within a framework based on basic ethical principles: probity, truthfulness, respect, responsibility, justice, transparency, efficiency, objectivity, loyalty and obedience, in the exercise of our functions, as well as in personal and commercial relationships.

In this context, we are committed to conducting our business in accordance with the highest legal and ethical standards, and we understand that our business conduct must be aligned with transparent conduct, aligned with our values and commitments in the Code of Integrity.

Understanding and living the commitments of our organization's Code of Integrity is essential to safeguard our reputation and our economic well-being and sustainability over time, so complying with our policies and procedures is our individual responsibility and failure to do so may result in negative consequences for PETROPERÚ S.A. for all of us who work in it and for the stakeholders involved.

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I INTRODUCTION

In order to ensure the sustainability of PETROPERÚ S.A., the Integrity System has been established, which through the Integrity Code, policies, norms and procedures establishes the standard of ethical conduct that must be met, as well as the mechanisms and components to strengthen the culture of integrity and transparency of PETROPERÚ S.A., prevent, detect and respond to irregular acts.

In this sense, the Integrity Code is the document that guides our conduct, and through it we commit ourselves as workers and as a Company to execute our strategy and fulfill our mission and vision by always doing the right thing, guided by our corporate values to consolidate a culture of integrity and transparency.

That is why we base our ethical conduct on commitment, which we firmly maintain with our Company and with our co-workers, clients, market, competition, suppliers, State, community, environment and the media.

In this sense, the Integrity Code is mandatory for the representatives of the State before the General Meeting of Shareholders of PETROPERÚ S.A., Directors, workers under any type of labor contract, business partners, and interns with labor training modality or other modalities. This should become a behavioral guide, designed to lead our actions in the face of different situations that we might face in our work.

While this document addresses a number of situations that any of us may encounter at some point, it is not possible to cover all situations that may arise. If we are not sure about the correct way to act, it is our duty to consult or report such situations through the mechanisms established for this purpose.

Any breach of what is regulated not only in this, but also in any other document that makes up the Integrity System and that guides our daily actions, will lead to the application of disciplinary measures in accordance with the Internal Work Regulations of PETROPERÚ S.A.

II MISSION, VISION, VALUES AND PRINCIPLES OF PETROPERÚ S.A

OUR MISSION

To provide quality hydrocarbons, carrying out our activities with reliability, financial sustainability and socio-environmental responsibility.

Coordinate with the relevant stakeholders the actions necessary to promote the sustainable development of the company and the energy industry in Peru.

OUR VISION

To be a mixed capital energy company, recognized for its transparency, efficiency and socio-environmental responsibility.

OUR VALUES

- **TRANSPARENCY**
I openly and clearly communicate my intentions, obligations and actions in the development of my activities.
I say what I think with respect.
 - **INTEGRITY**
I am consistent between what I think, say and do.
I am honest and protect the interests of PETROPERÚ.
 - **EFFICIENCY**
I continuously measure, control and optimize my processes.
I take on challenges and acted proactively.
 - **FOCUS ON PEOPLE**
I respect my colleagues.
I recognize individual achievements.
I work as a team in my area and between areas.
Equal Opportunities.
 - **SAFETY & SUSTAINABILITY**
I identify, evaluate and minimize the risks to my job, the company, the community and the environment.
trabajo, la empresa, la comunidad y el ambiente.
-

III OBJETIVE

The Integrity Code aims to establish the standard of ethical behavior for all those who make up the Company and for those who are related to it, in order to achieve the mission, vision and strategic objectives of PETROPERÚ S.A. while safeguarding its sustainability, image and reputation.

IV LEGAL BASES

- Integrity Code of PETROPERÚ S.A.
- Code of Good Corporate Governance of PETROPERÚ S.A.
- Internal Work Regulations of PETROPERÚ S.A.
- National Integrity and Fight Against Corruption Plan (2018-2021) approved by Supreme Decree No. 044-2018-PCM.
- ISO 37001:2016 Anti-bribery management systems. Requirements with guidance for use.
- Law No. 30424, Law that regulates the administrative responsibility of legal persons for the Crime of Active Transnational Bribery, Legislative Decree No. 1352 and its Regulations approved with Supreme Decree No. 002-2019-JUS.
- Supreme Decree No. 138-2019-PCM establishes the obligation to submit the Affidavit of Interests in the public sector, Emergency Decree No. 020-2019 and its Regulations approved with Supreme Decree No. 091-2020-PCM.
- Good practices and standards of the Organisation for Economic Co-operation and Development (OECD).

V SCOPE AND RESPONSABILITY

Scope: The Integrity Code is mandatory for representatives of the State before the General Meeting of Shareholders of PETROPERÚ S.A., Directors, workers under any type of labor contract, business partners, and interns with labor training or other modalities.

Responsibility: The Integrity Code is approved by the Board of PETROPERÚ S.A., and its implementation, supervision, verification and compliance with what is established in this document is in charge of the Compliance Office.

Likewise, all workers have the obligation to sign the Commitment to Adherence to the Integrity System annually, upon joining the Company or when there is a change. By means of said document, they declare that they have received and read the regulations that are part of the Integrity System of PETROPERÚ S.A., also declaring possible situations of conflict of interest in accordance with the provisions of this Integrity Code and the established guidelines.

VI DEVELOPMENT OF THE DOCUMENT

1. OUR COMMITMENTS

a. WITH OUR COWORKERS

- i. Good work environment and respect
- ii. Safe Work Environment

b. WITH OUR COMPANY

- i. Responsible use of the position of trust.
- ii. Information integrity of PETROPERÚ S.A.
- iii. Preservation of intellectual property.
- iv. Correct use of confidential information.
- v. Fraud Prevention.
- vi. Avoiding Conflicts of Interest.
- vii. Protection of the reputation, image and representation of PETROPERÚ S.A.
- viii. Criteria for the acceptance or granting of gifts and hospitality.
- ix. Responsible use of PETROPERÚ S.A. assets and information technology.
- x. Responsible use of the travel budget.

c. WITH OUR CLIENTS, COMPETITORS AND SUPPLIERS

- i. Preserve a fair and ethical relationship.

d. WITH THE STATE, THE COMMUNITY, THE ENVIRONMENT AND THE MEDIA

- i. Prevention of acts of corruption and bribery
- ii. Relationship with public officials and political contributions
- iii. Prevention of money laundering, financing of terrorism and drug trafficking
- iv. Compliance with laws, regulations and rules of voluntary application
- v. Protection of the environment
- vi. Good relationships and social support with our communities
- vii. Relationship with the media

COMMITMENT TO OUR CO-WORKERS

Good work environment and respect

- We respect our work environment and promote dignified, respectful and courteous behavior among our colleagues.
- We promote professional growth and development based on the competencies, qualities, experience and merits of our co-workers, as well as leadership among colleagues on work teams.
- We promote equity, diversity and inclusion of workers by building highly qualified teams to carry out the Company's processes; for which we comply and enforce our Equity, Diversity and Inclusion Policy.
- We promote teamwork and honest and transparent dialogue, through comprehensive, two-way and transversal communication, truthful, understandable and effective, solving complex situations based on dialogue, consensus, respecting the diversity of opinions of those who differ from us.
- We share information, knowledge, experiences and feelings to generate bonds of trust, communication being a transversal activity that we all develop in our Company, maintaining confidentiality if necessary.
- We value the transmission of knowledge and good work practices among co-workers, which generate value and contribute to the achievement of the Company's objectives.
- We promote equal opportunities based on a fair and objective evaluation based on our level of contribution and the fulfillment of our goals.
- We reject all types of discrimination, distinction, exclusion or preference, for reasons of origin, sex, sexual orientation, gender, age, socioeconomic, employment, religion, hierarchical level or other.
- We reject any act of harassment of any kind, intimidation or offenses. We do not tolerate sexual harassment or harassment in any of its forms.

Safe Work Environment

- We care about ensuring that the work environment is free from acts of verbal, physical or psychological abuse.
- We identify the dangers to which our co-workers are exposed and recommend the implementation of actions to prevent any possible situation that could put their health and physical integrity at risk.
- We immediately report unsafe conditions through the Suspension of work until the risks detected are minimized.
- We share, comply with and enforce our Integrated Management Policy for Quality, Environment, Safety and Health at Work, as well as all applicable regulations on occupational safety issues.
- We demand the same diligence from our visitors, suppliers, clients and anyone who carries out activities in our facilities to ensure compliance with regulations related to occupational safety.
- We seek the physical and mental well-being of our co-workers, promoting healthy lifestyle habits such as: physical activity, healthy eating and respect for the biosafety and health standards set by the Company or the State, as well as the promotion of a balance between personal and work life.
- We ensure the optimal performance of our functions, which must be carried out free from the effects of alcohol and drugs or avoiding any attitude or behavior that puts the safety and health of our co-workers at risk.
- We reject having a passive attitude when faced with the identification of health and safety hazards and risks that arise at work. Any identified issues are important and must be addressed proactively.

COMMITMENT TO OUR COMPANY

Responsible use of the position of trust

- We build and preserve the trust that PETROPERÚ S.A. and our superiors place in the way we make decisions and we promise to act, at all times and in any aspect of our work with the highest standards of honesty, truthfulness and ethics. Consequently:
 - » We enforce the Constitution, legal provisions and regulations. We also comply with the internal rules, policies and procedures of the Company.
 - » We are faithful to compliance with this Integrity Code and other regulations that PETROPERÚ S.A. has defined to support and promote its culture of integrity and transparency.
 - » In situations that could violate legal regulations or internal regulations, or affect PETROPERÚ S.A., we carry out the necessary consultations before taking action to have the proper ethical and legal support, avoiding exceeding functional and authority limits.
 - » We provide quality and efficiency in the development of each of our functions and tasks assigned by the immediate boss, seeking the optimal result, in time and resources, within the deadlines, methods, policies, standards and procedures established by PETROPERÚ S.A. and current regulations.
 - » We fulfill our obligations as employees of PETROPERÚ S.A., in line with the corporate values established by the Company.
 - » We refuse to make decisions in a manner influenced by personal, family, financial, or other interests.
- We are responsible for relations with our shareholders, providing them equitable treatment and based on the principles of Corporate Governance.
- We recognize that we are representatives of PETROPERÚ S.A., therefore our actions could affect its image and reputation.

- We are accountable and have a transparent relationship with all our stakeholders, nationally and internationally, providing clear, exact, sufficient and timely information through the managers designated by PETROPERÚ S.A.

Information integrity of PETROPERÚ S.A.

- We ensure the integrity of the Company's information, keeping the information generated accurately.
- We promote the timely, complete, correct, impartial and precise record of the transactions and operational, administrative and commercial activities of PETROPERÚ S.A., complying with the corresponding legal provisions and applicable regulations.
- We are transparent, complying with the T.U.O. of the Law of Transparency and Access to Public Information and with our Corporate Transparency Policy, providing and sharing public information on business management to citizens, in a clear, exact, sufficient, updated, useful manner and timely.
- We comply with International Financial Reporting Standards (IFRS), with Generally Accepted Accounting Principles (GAAP), Tax Standards, Generally Accepted Accounting Principles and with the control guidelines issued by the Company and regulatory bodies, in order to provide adequate financial information for our different stakeholders.
- We support operations that involve an accounting record, with documentation that: supports the transaction, complies with tax requirements, and is accurate; providing reasonable detail, registration in the accounting accounts and entry at the time the operations take place, seeking traceability and transparency.
- We timely present financial, social, environmental and Corporate Governance reports, among others, to the organizations to which the Company is obliged to report, fully, transparently and truthfully reflecting the situation of PETROPERÚ S.A., in order to preserve the trust of our stakeholders.
- We reject any type of manipulation or alteration

of the information registered in the Company, by unauthorized persons or processes, and those who make up PETROPERÚ S.A. must report any situation that contravenes the stipulations.

Preservation of intellectual property

- We preserve the information or material protected by property rights and the intellectual capital of PETROPERÚ S.A., clients, suppliers and other third parties.
- We ensure the proper use and protection of the intellectual property of PETROPERÚ S.A., such as industrial secrets, registered trademarks, signs, identity symbols (logos) and patents, we also recognize that inventions, improvements, innovations and developments generated as PETROPERÚ S.A. workers, in direct relation to our functions and responsibilities, are the property of PETROPERÚ S.A.
- We appropriately use patented or registered documents or materials, respecting the intellectual property rights of other Companies.
- We reject the improper use of the intellectual property of PETROPERÚ S.A. as information, knowledge, signs and symbols (logos), trademarks, among other tangible and intangible assets, for purposes other than those strictly necessary for the exercise of our functions.

Correct use of confidential information

- We declare the existence of confidential information, the protection and confidentiality of which is relevant to the interests of the Company, applying the criteria contemplated in the T.U.O. of the Law of Transparency and Access to Public Information for its qualification.
- We protect the information classified as confidential of PETROPERÚ S.A., so we act with integrity, making proper use of the confidential information of PETROPERÚ S.A., without obtaining advantages or personal benefits to the detriment of the interests of PETROPERÚ S.A.

- We recognize that it is illegal to trade stocks or other securities using confidential information. This includes all information that could put an investor in an advantageous position to buy or sell shares of PETROPERÚ S.A. This information could be related to the following topics (but not limited to these):
 - » Performance forecasts (profit or loss)
 - » Restructuring operations
 - » Important changes in the Administration
 - » New acquisitions or investment withdrawal.
 - » Launches or relaunch of products or projects, or their deactivation
 - » Customer and supplier listings, pricing structures and policies
 - » Commercial and operational guidelines, policies and practices
 - » Financial problems, among others
 - » The processes or improvements related to the main business of the Company
 - » Development of new products, signs, symbols, brand, services or processes
- We reject the sharing of confidential information outside the scope of PETROPERÚ S.A., among friends, members of our families, or internally with personnel who do not need it, since, when improperly used by suppliers, clients or competitors, in the stock market or in other environments, the value of PETROPERÚ S.A., its brands and shares could be affected.
- We do not reveal or make improper use of confidential information of the companies or entities of the State with which PETROPERÚ S.A. maintains a contractual relationship or agreements.

Fraud Prevention

- We are committed to implementing actions that contribute to the prevention of risks of any fraud situation that impacts or may impact the organization, such as the following cases (but not limited to these):
 - » Appropriation of assets or information of PETROPERÚ S.A.
 - » Acts of manipulation of operational reports or financial statements.
 - » Actions that are linked to theft, robbery, sabotage and embezzlement.
 - » Any other illegal act that goes against the integrity of PETROPERÚ S.A. and people.
- We apply fraud prevention mechanisms such as the following:
 - » Updating and formalization of PETROPERÚ S.A. policies and the Integrity Code, as well as their dissemination and training to our co-workers.
 - » Risk assessments for the implementation and improvement of controls.
 - » Monitoring of effective compliance with the policies and controls established by PETROPERÚ S.A.
 - » Implementation and facilitation of our workers' access to communication channels to report irregular activities.
 - » Consistent application of sanctions in case of proven irregularities.
- RWe reject any act that constitutes fraud, and we remain attentive to any fact, indication or suspicion that represents a possible irregularity committed internally or by third parties, immediately reporting it to the competent internal authorities through the corresponding channels that PETROPERÚ S.A. has made available to your workers.

For further reference, review the Integrity System Guideline, referring to point I Anti-Fraud Guideline.

Avoiding Conflicts of Interest

- “Conflicts of Interest” are considered any situation in which the personal, family, labor, economic, financial, business or political interests of a PETROPERÚ S.A. worker may interfere with the judgment or with the proper fulfillment of their functions, obligations and responsibilities under your charge. This includes when the PETROPERÚ S.A. worker, or through them, their family members or third parties, may obtain a benefit or satisfy interests for having participated in any management, contracting, business or activity of PETROPERÚ S.A.
- We act with honesty and ethics always seeking to protect the interests of PETROPERÚ S.A., and as workers we avoid situations that mean or could mean a conflict between personal interests and the interests of PETROPERÚ S.A. these situations could be related, but not limited to the following:
 - » Take advantage of business opportunities for personal benefit that arise or arise as a result of our work activity at PETROPERÚ S.A.
 - » Take advantage of our position in PETROPERÚ S.A. for personal benefit or that of third parties.
 - » Use the assets, as well as the confidential and strategic information of PETROPERÚ S.A. for personal benefit or that of third parties.
 - » Compete directly or indirectly with PETROPERÚ S.A.
 - » Being direct or indirect suppliers of companies that maintain some kind of business relationship with the Company.
 - » Carry out other activities that interfere or conflict directly or indirectly with our activities at PETROPERÚ S.A.
 - » Influence third parties or be influenced by third parties to the detriment of the interests of the Company, putting personal or family interests first.
 - » Other risk situations identified by the Prevention Officer.
- We exercise our functions with transparency and ethics, and in order to prevent potential, apparent or real conflicts of interest, we are obliged to make a declaration of our interests through the Commitment of Adherence to the Integrity System, on an annual basis, upon joining the Company, or when there is any change, reporting our professional and/or economic activities and that of our relatives within the second degree of consanguinity and second degree of affinity, due to marriage, de facto union and/or adoption.
- In this sense, the mandatory information that every worker must declare is the following:
 - » As a worker: The private exercise of a professional and/or economic activity, relevant social, union or civic position, as a natural person or in other institutions, organizations and/or companies other than PETROPERÚ S.A.
 - » About my relatives: The professional and/or economic activity of our relatives within the second degree of consanguinity, second degree of affinity (father, mother, children, brothers/sisters, grandparents, grandchildren, father-in-law, son-in-law/daughter-in-law, brothers-in-law, grandparents of the spouse), spouse, de facto union and/or adoption.
- Likewise, in addition to the obligation to declare what is indicated in the previous point, we recognize that situations of conflict of interest may also arise with other groups of relatives (uncles/aunts, nephews, cousins/brothers/sisters, etc.) Therefore, if I have knowledge that a relative works for a supplier, contractor, client or competitor related to my functions and responsibilities, I declare it preventively.
- If there is a conflict of interest situation when participating in any management, contracting, business or activity of the Company, I am obliged to report this situation to my immediate boss and request to inhibit myself from making any decision.
- We are committed to communicating our family relationships within the organization to our immediate boss and the corresponding People Management areas, in order to avoid a situation of

supervisory conflict of interest between relatives within the Company.

- If there are doubts regarding the existence or not of conflicts of interest, whether ours or those of third parties, we seek the proper guidance with the Integrity and Transparency Unit of the Compliance Office.

For further reference, review the Integrity System Guideline, referring to point IV Guideline on Conflicts of Interest.

Protection of the reputation, image and representation of PETROPERÚ S.A..

- The reputation of PETROPERÚ S.A. depends on our behavior. As such, this must reflect our corporate values, in coherence with the reputational keys for which PETROPERÚ S.A. wishes to be recognized among its stakeholders, such as transparency, integrity, commitment to the country, efficiency and quality. On that note:
 - » We try to act in our daily life in accordance with the values of the Company, protecting the image, reputation and interests of PETROPERÚ S.A.
 - » ii. We internalize and practice the values and principles of PETROPERÚ S.A. in our professional conduct in our work center and with our stakeholders.
 - » iii. We avoid making official statements on behalf of PETROPERÚ S.A. without express authorization in accordance with those established in the Information and Communications Policy and applicable regulations.
- We behave in accordance with the principles and values of PETROPERÚ S.A., even when we are outside working hours or in external events, in which we participate on behalf of PETROPERÚ S.A. (eg: congresses, fairs, symposiums, courses, inaugurations, awards ceremony, cocktails, among others).
- We value freedom of expression and opinion, however, we make sure that our opinions are not interpreted as official opinions or points of view of PETROPERÚ S.A., we do not use letterhead or emails

from PETROPERÚ S.A. to express opinions or carry out personal activities.

- When mentioning PETROPERÚ S.A. in the media or social networks, as ambassadors of the Company's brand, we take special care that our opinions affect the image and reputation of the Company, as well as its Shareholders, Directors, Managers and/or workers.
- We do not participate as representatives of PETROPERÚ S.A. in meetings, seminars, etc. without the respective authorization granted by their immediate boss or the corresponding communication to the People Management Department.
- We act with due diligence when engaging with Directors, PETROPERÚ S.A. employees, clients, suppliers and other business partners, applying the controls and mechanisms established to prevent economic and/or reputational risk.
- We supervise with due diligence those services provided by third parties, in which they act on behalf of PETROPERÚ S.A. against both national and foreign public officials, and/or before other stakeholders, to ensure compliance with the ethical guidelines of PETROPERÚ S.A.

Criteria for the acceptance or granting of gifts and hospitality

- The acceptance of gifts or hospitality from third parties should not be understood or used as a means to influence the decisions of the recipient, except in the case of legitimate promotional or advertising materials (merchandising) with the exceptions contemplated in the Integrity System Guidelines, referring to point V Guideline for gifts and hospitality.
- Gifts or hospitality must not compromise or appear to compromise our integrity or objectivity, or create an expectation of obligation to the third party.
- We apply our good judgment, or if necessary we seek guidance with our immediate superior or with the Integrity and Transparency Unit of the Compliance Office, to avoid any indication of conflict of interest, corruption or bribery generated by the acceptance or delivery of gifts and hospitality.

- The gifts and hospitality that PETROPERÚ S.A. grants to third parties are allowed only when they correspond to legitimate business purposes, following the guidelines and authorization established in the Integrity System Guidelines.
- We reject gifts or hospitality that are intended to influence the decision of the recipient, likewise, we reject those that are given in a personal capacity or on behalf of our family members, as well as those received at addresses other than those of the Company.

For further reference, review the Integrity System Guidelines, referring to point V Guidelines for gifts and hospitality.

Responsible use of PETROPERÚ S.A. assets and information technology

- We use the goods or assets that PETROPERÚ S.A. provides us for the performance of our functions and responsibilities for the benefit of PETROPERÚ S.A. and not for personal or third-party purposes. We understand that these goods are owned by PETROPERÚ S.A. and that they refer to tangible (physical) and intangible goods or assets (information, business plans, patents, brands, symbols, logos, among others).
- We are responsible for the proper use, care and protection of assets, especially those that are under our allocation or control, including technological resources, as well as physical and electronic information.
- We use the technological resources of PETROPERÚ S.A. responsibly and in a manner consistent with this Code and with all other policies and guidelines of the Company, including those specifically related to information technology, information security, data protection, confidential information and intellectual property rights (eg: desktop computers, portable computing equipment, network servers, Internet access, intranet, electronic mail access devices, voice mail, fax machines, desk phones, and smart phones).
- We are responsible for the proper use of the information of PETROPERÚ S.A. and we take the

necessary measures to comply with the provisions of its policies and current regulations.

- We understand that the use of the domain of PETROPERÚ S.A. (trabajador@petroperu.com.pe) is only for the purpose of work and development of the Company's functions.
- Given their nature, the technological resources that we use, as well as the audit, monitoring and control procedures that PETROPERÚ S.A. carries out, are of limited personal use.
- We recognize that the inappropriate use of the information or the mere breach of the information security policy or the other related PETROPERÚ S.A. policies collides with the provisions of this Integrity Code.
- We do not upload, download, send, view or access electronic information that is questionable or that could cause discomfort, inconvenience, offense, that could be morally unacceptable.

Responsible use of travel budget (per diem)

- **Estao** We are committed to the correct request, estimation, approval and use of the budget and the facilities assigned by PETROPERÚ S.A. for trips to the interior and exterior of the country, based on compliance with PETROPERÚ S.A. policies and the real needs of the business.
- We report travel expenses strictly following what is established by the regulations and policies established by PETROPERÚ S.A., attaching the payment vouchers that support the expenses accurately, completely, reliably and within the term.
- We request and/or approve travel expenses based on the defined budget indicated in the per diem scale established in the Procedure for Travel and Assignments to the Interior of the Country of PETROPERÚ S.A. and the real business needs.
- We reject the misuse of the travel budget and the deliberate recording of false or inaccurate data in a way that may mislead or seek a personal benefit of the worker.

COMMITMENT TO OUR CUSTOMERS, COMPETITORS AND SUPPLIERS

Preserve a fair and ethical relationship

- We strive to maintain equitable relationships based on the principles and values established in this document and other PETROPERÚ S.A. policies, also complying with the rules that regulate free competition in the market and prohibit unfair competition practices.
- We are careful so that the interest in achieving the objectives defined by the business does not affect our personal reputation or the image of PETROPERÚ S.A., and of the workers, so we do not get involved in irregular transactions.
- We develop business relationships based on good faith, trust, transparency, respect and a long-term vision, to build mutually beneficial relationships with clients, competitors and suppliers, therefore:
 - » We demand that our suppliers and clients declare their commitment to our ethical and anti-corruption principles.
 - » We provide dignified treatment, based on respect and non-discrimination, to all the people who work for our clients, competitors, suppliers and other interest groups.
 - » We honor our promises, agreements and commitments, preserving the image of the Company.
 - » We reach agreements with our clients and suppliers in a fair, ethical and transparent manner.
- We are committed based on high ethical standards and strict respect for the laws that regulate the market. Consequently:
 - » We do not engage in restrictive practices of free competition, as well as in acts defined by current regulations as unfair competition.
 - » We do not take actions that are intended to harm our competitors or third parties in general.
 - » In order to expand the Market, we comply with the provisions of this document, we do not abuse our

position in the Market, with respect to any product or in the geographical areas where we operate.

- » We reject any act of corruption.
- Our relationship with suppliers, within the framework of contracting goods, services and works, is carried out in accordance with the principles and guidelines of the Procurement and Contracting Regulations of PETROPERÚ S.A. as well as in accordance with the established logistics procedures.
- We know, understand and comply with the laws and regulations that apply to us when we do business with private companies.

COMMITMENT TO THE STATE, THE COMMUNITY, THE ENVIRONMENT AND THE MEDIA

Prevention of acts of corruption and bribery

- We promote a culture of zero tolerance as a mechanism to fight against all acts of corruption, complying with the corresponding corporate policies.
- We reject any type of act of corruption and bribery, acting with rectitude, honesty and honesty, trying to satisfy the legitimate interests of our Company, discarding the benefit or personal advantage, obtained directly or indirectly (through third parties).
- We do not offer or accept payment, gift, promise of bribery or any type of benefit to third parties or to our own during the negotiations, procedures or procedures related to the operations of PETROPERÚ S.A.

Relationship with public officials and political contributions

- We respect the authority of entities and public officials wherever we conduct our business, and we maintain honest and ethical relationships with the same.

- We know, understand and comply with the laws and regulations that apply to us when we do business with the central government, regional and local governments, or foreign governments.
- We do not make offers of payment or any type of benefit to public officials, both national and foreign, during the negotiations, procedures or procedures related to the operations of PETROPERÚ S.A.
- We do not carry out political proselytizing activities for or against any political party (either during or outside the electoral calendar), within working hours, while remaining in institutional premises, or during service commissions. Likewise, we do not use the infrastructure, assets or resources of the Company, including the use of the institutional website and email, either for our own benefit or for or against political parties or organizations or candidates.

Prevention of money laundering, financing of terrorism and drug trafficking

- We comply with the rules regarding the prevention of money laundering and terrorist financing and we support local and international efforts to prevent crime.
- We execute actions and implement controls to prevent our activities from being used for illicit operations that threaten the legitimacy and transparency of local and international trade.
- We seek continuous improvement in security processes, operations and protocols, in order to avoid the occurrence of illegal activities.
- We comply with the duties established in the regulation for the prevention of Money Laundering and Terrorism Financing, putting special diligence on:
 - » Pay special attention to detect unusual or suspicious operations.
 - » Register individual and multiple operations carried out by our clients.

- » Understand that it is prohibited to inform any person, entity or body, any information requested and/or provided by the FIU-Peru.
- We refuse to have a passive attitude to detect and prevent illegal acts in our processes and activities.

For further reference, consult the Policy and Manual for the Prevention of Money Laundering and Terrorism Financing.

Compliance with laws, regulations and rules of voluntary application

- As a company we comply with the laws and regulations applicable to PETROPERÚ S.A.
- We responsibly evaluate our relationship with companies or third parties that could be related to legal breaches, in order to protect the image and reputation of PETROPERÚ S.A.
- We timely report any suspected breach of legal or regulatory obligations through the communication channels that PETROPERÚ S.A. has made available to its workers.
- We support local and international efforts to prevent illegal activities.
- We reject all forms of child labor and forced labor, both within our Company and by our contractors and subcontractors, throughout our value chain.
- We are committed to the Principles of the United Nations Global Compact, the Equator Principles, the Universal Declaration of Human Rights, the Sustainable Development Goals, the Principles of the Organization for Economic Cooperation and Development and the best practices applicable in this matter.

Protection of the environment

- We are committed to developing environmentally sustainable activities and we understand the importance of protecting the environment.
- We promote the efficient use of resources and

comply with the environmental laws and regulations applicable to our businesses.

- We are diligent to identify and support the implementation of appropriate actions to prevent, control or correct conditions related to environmental risks.

Good relationships and social support with our communities

- We recognize our responsibility as members of PETROPERÚ S.A. and we care about playing an active and positive role in supporting a fair, dignified and sustainable society, in compliance with our Social Management Policy.
- We act in a socially responsible manner, within the laws, customs and traditions of the areas where we operate, recognizing, respecting and valuing the cultural diversity of the populations in our areas of influence, seeking mutual benefit.
- We promote capacities and the development of sustainable economic activities. We make social contributions or donations that promote sustainable development and the improvement of the communities where we operate, ensuring compliance with the Money Laundering and Terrorism Financing Policy, and under the necessary authorizations before its execution.
- We develop open and cordial relationships with the communities neighboring our activities, based on dialogue and participation; establishing channels that allow communities to communicate their concerns to PETROPERÚ S.A.

Relationship with the media

- PETROPERÚ S.A. undertakes to disclose accurate, sufficient, timely and truthful information to our stakeholders through the formal channels established, in accordance with the Information and Communications Policy.
- We are oriented towards a culture that favors horizontal, open and honest communication, based

on growing connectivity, participation, interaction, and knowledge creation, in which we respect the opinions of those who differ from us.

- We have authorized spokespersons to serve the interest groups with which the Company is related.
- We disseminate our actions of social responsibility and promotion of national culture, in such a way that it generates pride among our interest groups and in the national community as a whole.
- We avoid spreading unofficial information about PETROPERÚ S.A., by any means of communication, regarding its operation or its clients, if applicable.

2. ON THE INTEGRITY AND DISCIPLINE COMMITTEE

MAIN OBJECTIVE OF THE COMMITTEE

The Integrity and Discipline Committee is the competent body to investigate complaints and cases against ethics, integrity or corruption, including cases of great importance, complexity, impact on the image of PETROPERÚ S.A. or serious financial damage, and has disciplinary power, guaranteeing Equal criteria, impartiality and objectivity in the evaluation of irregular cases or events that may occur in PETROPERÚ S.A.

COMPOSITION OF THE COMMITTEE

The Integrity and Discipline Committee will be composed of an odd number of independent members, a minimum of three and a maximum of five members, approved by the Board of Directors, designating in the same way who will act as Chairman of the Committee.

Main functions of the Committee

- Investigation and sanctioning power on complaints and cases against ethics, integrity or corruption, including cases of great importance, complexity,

impact on the image of PETROPERU S.A. or serious financial damage.

- Contribute to the strengthening of the culture of integrity in the Company.
- Any other expressly entrusted to it by the Board of Directors of PETROPERÚ S.A. or the Audit and Control Committee.

For further reference consult the Regulations of the Integrity and Discipline Committee of PETROPERÚ S.A.

3 . HOW DO WE LIVE BY OUR CODE?

The Integrity Code provides us with the ethical principles and main guidelines on the basis of which we conduct our business; however, not all situations are explicitly contemplated in it.

If at any time we are not sure how to proceed or before making any decisions, we should ask ourselves the following questions:

- Is it legal?
- Is my decision in accordance with the values and principles of PETROPERÚ S.A.?
- Would I feel comfortable if my decision was made public?
- Could my decision damage the reputation of PETROPERÚ S.A. or mine?
- Have I consulted with my boss and the appropriate authorities?

If the answer to any of these questions is “No,” then we probably shouldn’t. If we are still in doubt, let’s seek help (see section “How do we report acts contrary to the commitments of the Integrity Code?”).

4. ¿HOW WE REPORT ACTS CONTRARY TO THE COMMITMENT THE INTEGRITY CODE?

If we have a suspicion or knowledge of a possible breach of this Integrity Code or any related Company policy, we must communicate through the Integrity Hotline (www.lineadeintegridadpetroperu.com) or through other channels.

PETROPERÚ S.A., through its regulations, ensures that complaints are investigated and

that the actions taken are appropriate.

The regulations and reporting channels are disseminated through training, awareness and communications to staff and among the different interest groups, and is part of

the contracts or agreements that under any form or modality we sign with any natural or legal person.

Issues that can be reported include, but are not limited to:

- » Conflict of interests
- » Appropriation or abuse of Company resources
- » Undue and/or fraudulent withholdings or disbursements
- » Confidential information leak
- » Alteration of records, reports or documents of the Company (Fraud)
- » Legal breach
- » Inappropriate behavior at work
- » Collusion
- » Bribery, gifts or improper hospitality
- » Influence peddling

- » Money Laundering and Terrorist Financing
- » Other unethical conduct

PETROPERÚ S.A. has a “non-retaliation” policy against any complainant for reporting any possible or actual breach. All complaints will be treated confidentially, identity protection will be applied and/or anonymity is accepted, in order to prevent reprisals or damages resulting from the presentation of the complaint.

For some advice in relation to situations of corruption, bribery and money laundering and terrorist financing, you can contact the Compliance Officer at the following email: cumplimiento@petroperu.com.pe.

5. COMMITMENT TO ADHERENCE TO THE INTEGRITY SYSTEM

I, _____, with file _____, who occupy the position of _____ in the Management of _____, declare that I have received and read the following documents:

1. Integrity Code of PETROPERÚ S.A.
2. Policy of integrity and fight against corruption and fraud of PETROPERÚ S.A.
3. Integrity System Guidelines of PETROPERÚ S.A.

Therefore, I declare that I understand and share the ethical guidelines detailed therein, and I promise to respect them and act by setting an example and communicating, through the Integrity Line (www.lineadeintegridadpetroperu.com) or other channels receiving complaints, any conduct that deviates from what is established in the aforementioned documents.

Regarding a Declaration of Interests:

I declare to have knowledge of the management regulations to avoid conflicts of interest, which is why I declare my interests related to the professional and/or economic activities of myself and my relatives within the second degree of consanguinity and second degree of affinity (father, mother, children, siblings, grandparents, grandchildren, father-in-law, son-in-law/daughter-in-law, brothers-in-law, grandparents of the spouse), spouse, de facto union or adoption:

Name of the signer or relative (*)	Relationship	Company or organization	RUC	Position/ Professional Activity
	Signer			
	Mother			
	Father			
	Sibling			

Likewise, I am aware that the following relatives (who are not part of the previous relationship) have ties with suppliers or contractors or clients or competitors related to my functions and responsibilities, which is why I declare it preventively:

Name of the signer or relative (*)	Relationship	Company or organization	RUC	Position/ Professional Activity

Other information to declare: _____

Date: _____

Signature: _____

This statement is based on the principle of veracity enshrined in the T.U.O. of Law No. 27444 - Law of General Administrative Procedure, submitting myself to subsequent inspection and to the pertinent legal actions of the company, in case the falsehood of the statement.

VI RECOMMENDATIONS AND COMMENTARY

In order to comply with the provisions of this Integrity Code, PETROPERÚ S.A. makes available to you the documents: (i) Corporate Policy for Integrity and the fight against corruption and fraud and (ii) Guidelines for the Integrity System.

Additionally, PETROPERÚ S.A. will entrust the corresponding Management with the responsibility of its administration, who will coordinate with the General Management the issuance of the corresponding regulations and other pertinent tools that contain the details required for its proper application, and must be known by all who are indicated in its Scope and disseminated to the general public.

Next revision date : 30.06.2023

Responsible for the next review : Compliance Office

The application of this Policy will be regulated by the specific regulations issued by the Administration.

VII CHANGES MADE TO THE PREVIOUS VERSION

This Integrity Code renders the Code CODA1-002 "Integrity Code of PETROPERÚ" v.1 approved with Board Agreement No. 087-2019-PP of September 09, 2019 and modified by Board Agreement No. 113 -2019-PP of October 21, 2019.

The main changes are:

- Inclusion of the guidelines of ISO 37001:2016 Anti-bribery management systems. Requirements with guidance for use.
- Alignment with Emergency Decree No. 020-2019 on declaration of interests of public officials.
- Good practices and standards of the Organisation for Economic Co-operation and Development (OECD).

INTEGRITY CODE
approved with
Board Agreement N ° 070-2021-PP
July 1, 2021.



Petroperú