

**CORPORATE INTEGRITY
POLICY AND THE FIGHT
AGAINST CORRUPTION
AND FRAUD**



**INTEGRITY
SYSTEM**



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1. COMMITMENT

PETROPERÚ S.A., through the members of the State representatives before the General Meeting of Shareholders, Directors and workers, undertakes to comply with the standards of conduct of this Policy and the Integrity Code, promoting a culture of integrity within the Company, promoting ethical conduct among workers, identifying, preventing, and if applicable, sanctioning acts contrary to ethics and corporate values of PETROPERÚ S.A., in order to safeguard its reputation and sustainability over time; Failure to do so could have negative consequences for the Company and for those of us who work in it.

In this way, PETROPERÚ S.A. conducts its business in accordance with the highest standards of Good Corporate Governance and Ethics, of the Organization for Economic Cooperation and Development (OECD), of the United Nations Sustainable Development Goals, and of the Policy National Integrity and Fight Against Corruption, and guarantees that its conduct is upright, honest and transparent with its stakeholders.

2. OBJETIVE

The objective of this Policy is to establish general principles to implement a culture of integrity and “zero tolerance” regarding acts contrary to ethics, corruption or fraud.

The Company’s position is to always act in accordance with the ethical standards of the Integrity Code, corporate values and other applicable regulations. Our culture of integrity and “Zero Tolerance” encourages PETROPERÚ S.A. to act with probity and ethics, and not to tolerate any type of conduct, active or passive, that constitutes corruption, fraud or any other irregular or inappropriate act on the part of its workers or business partners.

As a Company we understand that the trust placed in us by our business partners and interest groups is achieved from the honesty and seriousness with which we work, so we do not expose our Company to the risks associated with conduct contrary to the this Policy.

3. LEGAL BASES

- Code of Good Corporate Governance of PETROPERÚ S.A.
- Integrity Code 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.

4. SCOPE AND RESPONSIBILITY

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.

5. DEFINITIONS

- **Corruption:** Understood as the abuse of power exercised by an official, worker or business partner, by virtue of their position or position; at any level of the organization or in its links with it, to obtain an undue benefit, for itself or for a third party; exercising a conduct that deviates from the ethical behavior established for the exercise of the company’s activities and its relations with third parties.
- **Fraud:** It must be understood as an illegal act characterized by deception, concealment or breach of trust, usually perpetrated by individuals or organizations to secure advantages or some personal benefit (for example: money, goods or services) to third parties or for the organization. Among the types of fraud are: fraudulent reporting of financial and non-financial information, misappropriation of assets, other illegal acts.
- **Integrity:** It is a personal characteristic. As a value in PETROPERÚ S.A. it is to be coherent between what I say and do, to be honest and to protect the interests of the Company.

In the public sector, integrity refers to the consistent alignment and adherence to shared values, principles, and ethical standards, to uphold and prioritize public interests over private interests.

- **Probity:** Act with rectitude, honesty and honesty, trying to satisfy the general interest and discarding any personal profit or advantage or for third parties.
- **Transparency:** It constitutes a transversal axis in the management, linked to the veracity, reliability, quality, accessibility and timeliness of the information produced and published for all interested groups.

6. VISION STATEMENT

The Corporate Policy of Integrity and Fight against Corruption and Fraud of PETROPERÚ S.A. commits all those who are indicated in its Scope to:

- **Promo•** Promote a culture of integrity within the Company, directing the functions, activities and decision-making to the corporate values, commitments and ethical standards contemplated in the Integrity Code, in order to prevent cases of corruption, fraud or any other irregularity that affects the sustainability and reputation of the Company.
- Reject corruption and fraud, and preserve our position of “zero tolerance” against any act of corruption, fraud or contrary to ethics within PETROPERÚ, wherever it comes from, and the necessary actions are adopted in order to contribute to the determination of the fact and prosecute so that responsibilities are established.
- Ensure that the commercial, operational and administrative processes of PETROPERÚ S.A. are carried out and reported with honesty, accuracy and transparency, practicing probity in all its activities.
- Know the mechanisms designed to detect, prevent and control the risks related to acts of corruption, bribery or related crimes, in accordance with the Prevention Systems implemented to protect the assets and reputation of PETROPERÚ S.A.
- Identify and communicate situations of real, apparent or potential conflict of interest, personal or in relation to third parties, to the corresponding body for its verification, analysis,

registration, control and monitoring, in order to implement relevant mechanisms that allow avoiding damage to the workers and the Company, in accordance with the conflict of interest prevention management regulations approved for this purpose.

- Report, through the competent channels, in case of suspicion or knowledge of acts contrary to ethics, corruption or fraud, originating from any person or entity, or if there is a doubt or concern in relation to the activities that are contemplated in this Policy and other related regulations.
- Investigate cases contrary to ethics, corruption or fraud and apply the corrective measures that correspond to all those who are indicated in its Scope, regardless of the position, position, relationship with the Company or time of service, that achieve results in exchange for not complying the Law or act dishonestly. Support will be given to all workers who act with integrity, and those who refuse to make improper payments or acts, even if a business opportunity is lost as a result.
- Implement and disseminate this Policy and related documents; promoting them to customers, suppliers, contractors and, in general, to all business partners and stakeholders.
- Comply with all applicable laws, regulations, good practices and standards, and internally defined regulations that help mitigate the occurrence of acts of corruption and fraud, as well as strengthen the culture of integrity of the Company, in all those places where PETROPERÚ S.A. takes conduct your business.

7. ADDITIONAL REGULATIONS

In order to comply with the provisions of this Corporate Policy on Integrity and the Fight against Corruption and Fraud, PETROPERÚ S.A. makes available to you the documents: (I) Integrity Code - CODA1-002 (ii) Guidelines of the System of Integrity current version.

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.

8. RECOMMENDATIONS OR PRECISIONS

Next revision date: 06.30.2023

Responsible for the next review: Compliance Office

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

9. CHANGES MADE TO THE PREVIOUS VERSION

This document supersedes Policy POLA1-004 “PETROPERÚ’s Corporate Anti-Fraud and Anti-Corruption Policy” v.1 approved with Board Agreement No. 087-2019-PP of September 9, 2019.

CORPORATE INTEGRITY POLICY AND THE
FIGHT AGAINST CORRUPTION AND FRAUD
approved with
Board Agreement N ° 070-2021-PP
July 1, 2021.



Petroperú