

CORPORATE TRANSPARENCY POLICY

I. COMMITMENT

Petróleos del Perú – Petroperú S.A. ratifies its commitment to transparency, as a strategic value in its business management, as well as being a transversal axis in its processes, positioning it as a guaranteeing company of rights, open and with zero tolerance to corruption.

Likewise, Petroperú guarantees access to public information, providing complete, differentiated, truthful, comprehensible information in accessible formats and in a timely manner. On the other hand, it promotes and promotes different actions that contribute to the strengthening of a culture of transparency and accountability in Petroperú within the framework of good practices implemented in favor of transparency.

In line with this, Petroperú S.A., as part of its good practices in favor of transparency, voluntarily promotes transparency as a mechanism to fight corruption in all the management of its commercial, operational and administrative processes; an important instrument for good corporate governance and the strengthening of its institutionality, since this value promotes accountability, citizen participation and integrity, thus building a relationship based on trust.

II. OBJECTIVE

The objective of the Corporate Transparency Policy is to raise its management to the highest standards of transparency and good corporate governance, as part of governance, in order to guarantee access to citizen information and promote actions or spaces in favor of the culture of transparency in Petroperú S.A, in its commercial, operational and administrative processes, as part of good practices that help prevent or mitigate possible areas of corruption, contributing to the strengthening of our image and reputation as a company committed to transparency.

III. NORMATIVE BASIS

- American Convention on Human Rights.
- International Covenant on Civil and Political Rights.
- OECD Council Recommendations on Public Integrity.
- Sustainable Development Goals for 2030.

- Constitution of Peru.
- Law No. 30424, Law that regulates the Administrative Responsibility of Legal Persons, its amendments and Regulations.
- Legislative Decree No. 1353, Legislative Decree that creates the National Authority for Transparency and Access to Public Information, strengthens the Personal Data Protection Regime and the regulation of interest management.
- Supreme Decree No. 072-2003-PCM, approving the Regulation of the Law on Transparency and Access to Public Information.
- Supreme Decree No. 070-2013-PCM, amending the Regulations of the Law on Transparency and Access to Public Information, approved by Supreme Decree No. 072-2003-PCM.
- Supreme Decree No.019-2017-JUS, by which the Regulations of Legislative Decree No. 1353.
- D.S No.011-2018-JUS, by which the Regulation of Legislative Decree No.1353 is modified.
- Supreme Decree No. 021-2019-JUS, which approves the T.U.O. of Law No.27806, Law on Transparency and Access to Public Information.
- Code of Good Corporate Governance in force, approved by Board of Directors Agreement No. 110-2020-PP.
- Current Integrity Code approved by Directory Agreement No.070-2021-PP of 01.07.2021.
- Information and Communications Policy, approved by Directory Agreement No.103-2018-PP.
- POLA1-007 Corporate Transparency Policy, approved by Board of Directors Agreement No.071-2020-PP.

IV. SCOPE AND RESPONSABILITY

The Corporate Transparency Policy is mandatory for representatives of the State before the General Meeting of Shareholders of Petroperú S.A., Directors, workers under any type of employment contract, business partners and interns with labor training or other modalities, configuring itself as a guide for action in the performance of our functions.

The Policy not only implies transparency vis-à-vis those who carry out control, surveillance, control and supervision functions, but also vis-à-vis our stakeholders such as workers, customers, suppliers, investors, the State, communities, the media and citizens in general, in order to strengthen trust and legitimacy in society as a company committed to transparency.

This Policy will be approved by the Board of Directors of Petroperú S.A.

Likewise, the implementation, supervision, verification and compliance with the provisions of this document is the responsibility of the Corporate Communications and Institutional Relations Management.

V. DEFINITIONS

Good Practices: Actions that are carried out in favor of transparency and access to public information, without there being a legal norm that establishes its mandatory nature. These initiatives demonstrate the efforts that the entities have been making to increase transparency in the State.

Principle of Advertising: Legal principle that states that all information held by the State is presumed public, except for the exceptions to access expressly provided by law.

Accountability: Periodically give an account of their actions, justifying their actions and decisions before the public.

Transparency: The disclosure of relevant government information and data in a timely, accessible, understandable and reusable manner.

VI. VISION STATEMENT

The Corporate Transparency Policy commits all those who are indicated in its scope to:

1. Promote a culture of transparency, accountability, citizen participation and integrity as part of the management in Petroperú S.A., committed to the fight against corruption.
2. Adopt good practices and raise transparency standards that promote governance in Petroperú S.A. in its commercial, operational and administrative processes, especially sensitive and/or critical processes of public interest.
3. Implement open data mechanisms in the contracting of Petroperú S.A., allowing a modern, efficient and fair contracting system.
4. Guarantee access to public information of Petroperú, as a fundamental right in accordance with the principles of transparency and maximum publicity of information.
5. Ensure that the information provided to citizens in general is characterized by being true, clear, accurate, sufficient, up-to-date, useful, timely and of quality, delivered within the period established in the T.U.O of the Law on Transparency and Access to Public Information.
6. Not restrict access to public information on grounds of age, race, religion, language, political opinion, nationality, gender, sex or any other nature.
7. Ensure the protection and restrictive interpretation of the exceptions to access to public information indicated in articles 15°, 16°, and 17° of the T.U.O of Law No. 27806, Law on Transparency and Access to Public Information (Confidential, Secret and Confidential Information).

8. Promote the elaboration of public versions of the requested document, dissociating, carding or concealing that which contains restricted information in accordance with the cases of exception regulated in articles 15°, 16°, and 17° of the T.U.O of Law No. 27806, Law on Transparency and Access to Public Information.
9. Promote the signing of alliances and/or agreements with public entities or leading organizations that promote transparency.
10. Promote actions that contribute to the strengthening of transparency in Petroperú, especially in sensitive and/or critical processes.
11. Implement actions that help ensure compliance with access to public information.
12. Consider as a guide or reference for the management of transparency the Resolution Guidelines issued by the Transparency Court, as well as the Advisory Opinions and Legal Reports issued by the National Authority for Transparency and Access to Public Information (ANTAIP).
13. Promote the commitment of all workers to compliance with the Law on Transparency and Access to Public Information.
14. Strengthen integrity in Petroperú, through greater advertising spaces as part of the promotion of transparency and accountability, in order to prevent acts contrary to integrity.

VII. ADDITIONAL REGULATIONS

In order to comply with this Policy, the Administration may issue the corresponding regulations and other relevant tools that contain the details required for their proper application, and must be known by the directors and workers of Petroperú S.A. and disseminated to the general public, through the Transparency Portal of Petroperú S.A. and other means of communication.

VIII. RECOMMENDATIONS OR CLARIFICATIONS

Next revision date : 30.12.2024

Responsible for next review : Communications Corporate
Management and Institutional Relations.

IX. CHANGES MADE FROM THE PREVIOUS VERSION

This document supersedes POLA1-007 v.1 Corporate Transparency Policy approved with **AD Board of Directors Agreement No.071-2020-PP dated 16.07.2020.**

The Company.