

POLICY FOR THE PREVENTION OF MONEY LAUNDERING AND THE FINANCING OF TERRORISM, FELONIES OF CORRUPTION AND ANTI-BRIBERY MANAGEMENT

The Board of Directors of Petróleos del Peru (hereinafter referred to as PETROPERÚ S.A.) dedicated to the refining, distribution and commercialization of fuels and products derived from hydrocarbons, DOES HEREBY reject any act or attempt of Money Laundering and Terrorism Financing; and Corruption, under the form of Generic, Specific and Transnational Active Bribery, Influence Trafficking, Simple and Aggravated Collusion and others; as well as any act or attempt of bribery by its officials, workers and/or clients, suppliers, partners or related third parties, is committed to ensuring that the Company complies with the laws of Prevention of Money Laundering and Financing of Terrorism; Anti-Corruption and Anti-Bribery such as the United States Foreign Corrupt Practices Act of 1977 (FCPA); as well as the requirements of the Anti-Bribery Management System; maintaining and ensuring the continuous improvement of the Asset Laundering and Terrorism Financing Prevention System as Liable Party, in accordance with Law 27693 and its Regulations of the Corruption Crimes Prevention System under the scope of Law No. 30424, and amending and regulatory rules; as well as the Anti-bribery Management System in accordance with the Standard ISO 37001: 2016; as well as any other applicable regulations.

In this framework, PETROPERÚ declares that not contractual, labor or commercial relationships with natural or legal persons will be initiated, if they or some of their Partners (with the ownership of 10% or more of shares or participations), Directors or Managers; have been: i) Convicted, through a final judgment, for the crime of Money Laundering, Terrorism Financing, preceding crimes such as Drug Trafficking, Tax or Customs Crimes, Illegal Mining, Corruption or others that generate illegal profits; Generic, Specific and Transnational Active Bribery, Influence Trafficking, Simple and Aggravated Collusion, Bribery; at the national or international level, for the duration of the punishment imposed in the sentence; and/or if they would have accepted to have committed such crimes in said areas, during the period of 15 years from the acceptance, unless otherwise provided by law; or, ii) if they are included in the OFAC List (Office of Foreign Assets Control of the Treasury Department of the United States of America), List of Terrorists of the United Nations Security Council, List related to the Financing of the Proliferation of Arms Mass Destruction issued by the UN Security Council; or, iii) if they have submitted false documentation or omissions in the Affidavit delivered to the Company, as provided in the Peruvian Criminal Code, for a period of 6 years since the event occurred.

The Board of Directors has commissioned the Compliance Officer to, together with the licensed entity; supervise the implementation and maintenance of the aforementioned Prevention and/or Management Systems; being able to ensure that he/she enjoys authority, autonomy, and independence for the exercise of his/her functions; reporting to the Officer, any action, conduct, information or evidence that may violate this Policy.

The Company promotes and guarantees the implementation and operation of the Raising Concerns Procedure (called "Integrity Line"), through inquiries or complaints in good faith regarding suspicious facts or behavior, guaranteeing the confidentiality of these, as well as protection against any type of retaliation to the complainant.

Workers and/or third parties or interested parties who breach any of the provisions of this Policy will be subject, after investigation, to the corresponding administrative, civil, criminal measures and/or contractual actions.

Board Agreement No. 031-2021-PP dated 03.18.2021.

THE COMPANY.