

Anti-Bribery Policy of Senace

The Peruvian Environmental Licensing Agency - Senace, a specialized technical public body, attached to the Ministry of Environment, has decided to implement an Anti-Bribery Management System (ABMS), based on the international standard ISO 37001 with the objective of preventing, detecting and punishing bribery behaviors in the entity, as well as complying with the legal requisites related to the fight against bribery and other commitments acquired in this matter by the organization.

The Anti-Bribery Policy prohibits requesting, accepting, offering, paying, receiving, promising any kind of bribe, either directly or indirectly, for, or for the benefit of, the members of Senace, regardless of their contractual relationship with the organization (hereinafter, the "members of Senace"); as well as by, or for the benefit of, the project proponents, investment-promoting agencies, private organizations, business associations, social actors, suppliers, contractors or third parties that provide services under any type of contract (hereinafter, "interested third parties").

Without prejudice to criminal regulations on the matter, Senace understands that bribery is the direct or indirect act, of giving, offering, promising, requesting or receiving tangible or intangible assets, money, species, discounts or valuables, whether as donation, promise, gift, improper consideration or any other inappropriate benefit or advantage that aims to affect or influence the performance or decisions of any member of Senace.

Within the framework of its Anti-Bribery Policy, Senace commits to:

- a) Fight against bribery in all its forms by approving and implementing internal management documents that minimize the risks of bribery between Senace members and interested third parties.
- b) Promote and encourage knowledge of the Anti-Bribery Policy, the Code of Ethics and other ABMS documents to all Senace members and interested third parties.
- c) Appoint a Compliance Officer responsible for ensuring the effective implementation of the ABMS, with autonomy to perform these tasks and roles.
- d) Act with impartiality, transparency and ethical behavior in all activities carried out or executed, rejecting and denouncing bribery behaviors before the competent authorities.
- e) Train all members of Senace in its Anti-Bribery Policy, the Code of Ethics and the other documents of the ABMS.
- f) Make available the Anti-Bribery Policy, the Code of Ethics and the other documents of the ABMS to the suppliers, contractors or third parties that provide services to Senace under any modality of contracting.
- g) Have all the resources that are necessary to carry out the actions, measures and prevention and investigation controls of bribery behaviors.
- h) Implement a Complaints Channel that guarantees the confidentiality of complaints or suspicions related to bribery behaviors, whilst also protecting the user from any type of threat, coercion or retaliation.
- i) Establish measures and mechanisms for the continuous improvement to the ABMS.
- j) To initiate investigations to those civil servants of Senace that fail to comply with the Anti-Bribery Policy, the Code of Ethics and the other documents of the ABMS, and adopt the corresponding legal measures within the framework of a disciplinary procedure.