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	ANTICORRUPTION POLICY				Version: 05
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I. INTRODUCTION

The success of RIMAC SEGUROS and RIMAC EPS (hereinafter, “RIMAC” or “RIMAC EPS,” respectively, or, where referred to collectively, the “**Companies**”) is based on their reputation and the trust placed in them by their different stakeholders.

The reputation of the **Companies**, achieved over years in which honesty, integrity, respect, transparency and responsibility in the way they do business have formed the basic principles underlying their operations, cannot be put at risk by advantages obtained via improper means in the course of business dealings or transactions.

The **Companies** are aware that, because of the nature of the services they provide nationwide, they are engaged in relationships with public officials and public entities that may possibly give rise to the risk of bribery and other forms of corruption, whether directly through the **Companies’** employees or indirectly through third parties that represent them.

Thus, as part of their prevention activities, the **Companies** hereby formalize their “zero tolerance” policy on acts of bribery and other forms of corruption, reaffirm their position on such acts, and reject all activities, regardless of their nature, that seek to obtain or retain business or achieve undue advantages. We further declare that there are no valid justifications or reasons for tolerating or accepting irregular or illegal conduct by any area of the **Companies**

While this Policy addresses a number of situations that any employee or third party representing the **Companies** may face at any given moment, it is not possible to cover all those situations. If you are not sure about the correct course of action, every employee has the duty to consult or report such situations through the mechanisms established for that purpose.

Likewise, any employee has the individual duty to report any activity that is contrary to this Policy. For this reason, the Companies have implemented the Whistleblower Channel, also referred to as Integrity Channel, for the reporting of these activities. The channels made available to this end are as follows:

- Webpage to which communications can be sent:
<http://www.canaldeintegridad.com/rimac>
- E-mail:
rimac@canaldeintegridad.com
- Telephone number or voice mail:
0-800 1 8114 (option 2) o 219-7104 (option 2)
- Written communication to:
Ernst & Young, located at Av. Víctor Andrés Belaúnde 171 Piso 6, San Isidro, Lima 27, Lima – Peru, to the attention of Mr. Rafael Huamán.

Specify in the reference line: Integrity Channel and the name of the company (whether sea Rimac Seguros y Reaseguros or Rimac EPS).

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- Personal interview:

Av. Víctor Andrés Belaúnde 171 Piso 6, San Isidro, Lima 27, Lima – Peru, asking for Mr. Rafael Huamán.

Moreover, **inquiries** may be made through:

cumplimientonormativo@rimac.com.pe

II. PURPOSE

The **Companies** formalize in this document their policy of “Zero Tolerance” regarding acts of bribery and other forms of corruption. The purpose of this document is to establish a system to prevent bribery and other forms of corruption (general and specific guidelines that must be observed by the directors, executives, employees, suppliers, counterparties and any other business partners authorized to act on behalf of the **Companies**) in order to mitigate and detect, in a timely manner, acts related to the crimes of bribery and other forms of corruption within the framework of Law No. 30424, as amended by Legislative Decree 1352, which was amended by Law No. 30835, and other related and/or superseding provisions, thus properly complying with the applicable laws.

The guidelines for the prevention of Money Laundering and Terrorism Financing are contained in the Manual on Prevention and Management of Money Laundering and Financing Terrorism Risks. It is also important to mention that the management of these risks is under the responsibility of the Compliance Office.

In this regard, the specific objectives of this Policy are as follows:

- a. Define the principles and rules to identify and prevent “acts of bribery and other forms of corruption” (as defined below) so as to protect the integrity and reputation of the **Companies**.
- b. Provide the employees and third parties representing the **Companies** with general information on the measures adopted by the Company to prevent, identify, mitigate, and manage the risks of bribery and other forms of corruption.
- c. Ensure that the Companies comply with the local anti-corruption legislation in the countries or markets where they operate and in Peru within the framework of Law No. 30424, as amended by Legislative Decree No. 1352 or other related or applicable provisions.

III. SCOPE

This Policy is binding on the directors, executives, employees, suppliers, counterparties and any other business partners authorized to act on behalf of the **Companies** who may, in the discharge of their duties before national or foreign public officials or before third parties, execute acts related to the aforementioned crimes in violation of this Policy.

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IV. WHAT IS CORRUPTION?

- Corruption:** It is a crime consisting in the voluntary action of offering, paying, promising or authorizing the payment of a bribe (money or anything of value), proposing or participating in illegal agreements, and using or invoking influences, to a public official, political party, or political party candidate, either directly or indirectly, for their own benefit or that of third parties, in order to induce such public official, political party or political party candidate to act or refrain from acting in relation to the performance of their official duties, for the purpose of obtaining or retaining business or any other undue advantage.

Some methods through which corruption acts may be undertaken include:

- offering and accepting prohibited, inappropriate, undue or illegal gifts.
- excessive hospitality;
- payment of donations to political and charitable organizations;
- inappropriate or excessive sponsorship;
- the settlement of a claim that does not comply with the conditions of the policy.

A “corruption act” may give rise to the imposition not only of criminal sanctions on the persons involved but also administrative, legal or criminal sanctions on the Company. The foregoing may cause serious damage to the Company and the trust of clients and other stakeholders.

V. ROLES AND RESPONSIBILITIES

All the persons comprised within the scope of this Policy are individually responsible for complying with the guidelines and commitments established herein, and for seeking guidance if necessary.

For purposes of the Anti-corruption Management System and this Policy, the following roles are considered:

1. Board of Directors (Governing Body)

- Appoint the Person in charge of the Anti-corruption Management System.
- Approve the Anti-corruption Policy proposed by the Compliance Committee.

2. Compliance Committee (Senior Management)

It has the following responsibilities:

- Draw up this Policy, submit it to the approval of the Board of Directors, without prejudice to draft the internal regulations supplementary to this Policy.
- Propose the tolerance to risk.

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- Establish the necessary resources, whether financial, technological and human, for a proper implementation and management of the Anti-corruption Management System.
- Supervise the implementation of this Policy and the development of the Anti-corruption Management System.
- Determine the necessary actions to get familiar with, disclose and strengthen the Companies' highest standards of conduct and ethics and of resolution of conflicts within its area of competence.
- In the discharge of its duties, the Compliance Committee shall also apply its own Regulations, which establish its duties, scope and responsibilities.
- Be informed on the reports and/or faults related to events of corruption or bribery, money laundering and terrorism financing within the company, and instruct the pertinent investigations.
- Evaluate and decide the appropriate sanction for the faults committed by the Companies' employees in connection with issues related to the Anti-corruption Policy and its annexes. These sanctions shall be imposed as provided for the Internal Work Regulations (IWR), without prejudice to communicating these events to the authorities for the pertinent purposes. This power may be delegated to the Talent & Transformation Division.
- Propose corrective and remedial actions that enable the continual improvement of the Anti-corruption Management System.
- Review and update this Policy and the Anti-corruption Management System on a yearly basis.

3. Risk Committee

It has the following responsibilities:

- Evaluate the design and implementation of the Anti-corruption Management System and controls to prevent, detect and properly respond to the risks of corruption, money laundering and terrorism financing.
- Approve, supervise and evaluate the structure of the Companies' Internal Control required to support the Anti-corruption Management System.

4. General Management

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It has the following responsibilities:

- Supervise the implementation of this Policy and the development of the Anti-corruption Management System in general.
- Authorize the adequate provision of financial, technological and human resources to implement and maintain the Anti-corruption Management System.

5. Person in charge of the Anti-corruption Management System

This function has the following responsibilities:

- Develop, define and implement the Anti-corruption Management System.
- Make reviews to verify compliance with the guidelines defined by the Anti-corruption Management System.
- Identify the areas and processes of the Companies that are most exposed to risks of corruption.
- Ensure that the Anti-corruption Management System conforms to the requirements set out in ISO 37001 – Anti-bribery Management System.
- Supervise the design and implementation of the Anti-corruption Management System.
- Inform the Compliance Committee and the Board of Directors, on a yearly basis, on the results of the management of the Anti-corruption Management System, which shall contain at least the following:
 - Status of the actions taken by the Management in connection with previous reviews
 - Changes in external and internal issues.
 - Performance of the Anti-corruption Management System: a) non-conformities and corrective actions; b) results of follow-up and measurements; c) results of the audits, d) report on bribes, e) investigations, f) risks of bribery
 - Efficacy of the measures adopted to cope with the risks of bribery
 - Opportunities for the continual improvement of the Anti-corruption Management System.
- Coordinate activities conducive to the proper application of the Anti-corruption Management System.
- Advise the employees on the red flags identified during the process of getting to know third parties.

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- Direct the investigations derived from the reports of suspected or confirmed bribery and other corruption acts, and take the necessary actions.
- Establish training parameters according to the Anti-corruption Management System.
- Answer questionnaires, market surveys, internal and external reports related to prevention of bribery and other corruption acts.
- Clear any doubts related to this Policy and its implementation.
- Assess the faults committed by the Companies' employees when they are related to the Anti-corruption Policy and its annexes, and refer to the Compliance Committee those cases deemed pertinent.
- Propose corrective and remedial actions for events related to violations of this Policy and make a follow-up on the measures proposed by the Compliance Committee.
- Propose the sanction to be imposed on the employee, when the fault is related to the Anti-corruption Policy and its annexes. The sanction to be imposed shall be subject to the Internal Work Regulations (IWR).
- Carry out the risk identification, assessment and mitigation process whenever structural or organizational changes or significant circumstances occur so that the necessary adjustments may be made to the Anti-corruption Management System, without prejudice to the annual review and updating of this Policy and the Anti-corruption Management System.

6. Internal Audit

It has the following responsibilities:

- Assess the efficiency and efficacy of the control environment through the monitoring of the program and key anti-bribery, money laundering prevention and terrorism financing control tests.
- Inform the Person in charge of the Anticorruption Management System on the reports filed in connection with bribery and other corruption acts

7. Vice Presidency of Talent & Transformation

It has the following responsibilities:

- Assist in including this Policy in its regulatory Training Program and in disseminating this Policy to all employees.

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- Evaluate and execute, if applicable, the sanction proposed by the Person in charge of the Anticorruption Management System or the Compliance Committee for an employee who has violated the Anti-corruption Policy or its annexes.

8. All the employees

All of them are responsible for the unconditional implementation of this Policy and shall act in keeping with the principles laid down in the Code of Conduct. They have the duty to inform or report any evidence, suspicion or occurrence of an event that may violate these rules.

VI. GENERAL GUIDELINES

The general guidelines of the Anti-corruption Policy are as follows:

- Due to the nature of the **Companies'** operations, relations with public officials are necessary for many normal activities in their line of business. There is also a real possibility that third parties may attempt to use the company as a means to channel funds gained through corruption. The company accepts and promotes positive relations between its employees and such officials, provided they do not violate any of the principles established in this Policy, the Code of Conduct, or any applicable anti-corruption laws.
- The **Companies** prohibit all acts of bribery and other forms of corruption, of any kind, in an attempt to retain or obtain business or obtain undue advantages or that use the **Companies** for the commission of such crimes. There are no valid justifications or reasons for tolerating or accepting irregular conduct.
- The **Companies** also declare that the Anticorruption Management System Team has the authority and autonomy to fulfill their responsibilities under the Anti-corruption Management System, as a fundamental part of the correct functioning of said system.
- Any employees, stakeholders, suppliers, counterparties or business partners who fail to comply with the requirements under the anti-bribery management system, controls applicable to their relationship with the **Companies**, or other guidelines set forth in this Policy, as applicable, shall be subject to the administrative and/or criminal contractual penalties corresponding to their specific offenses.

VII. SPECIFIC GUIDELINES

- Facilitation payments for bureaucratic procedures, paperwork, or activities that violate the regular procedures established for such purpose; the improper omission of requirements in administrative procedures and/or for the settlement of claims; securing documents via irregular means; and/or any other form of failure to use formal administrative or judicial channels employed by public officials on the part of the **Companies'** employees or third parties acting on their behalf is strictly prohibited.

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- The **Companies** prohibit the inclusion or authorization of false or deceitful notations in the operating records or the accounting books and records for the purpose of concealing improper payments (e.g., hiding a bribe by including it as part of the professional fees paid to a service provider).
- The hiring of third parties who represent or may represent the **Companies** is a risk, given that such third parties may make improper use of their representation to engage in acts of bribery or other forms of corruption. The Companies shall establish, depending on the scope and complexity of such representation, appropriate due diligence mechanisms for the hiring of third parties who act on behalf of the **Companies** before public officials or persons that may involve a risk of money laundering, terrorist financing, or illegal mining, to ensure that the **Companies** have the peace of mind of knowing who they are working with, such parties' reputations, and their qualifications.
- The **Companies** shall establish a control system, based on size, operations, and internal complexity, in proportion to the risks faced by the Companies, that provides reasonable certainty that assets are being used for authorized business purposes, and ensures that transactions are being recorded appropriately in the financial statements. This involves the implementation of the following activities, at a minimum:
 - Strengthening of a culture of ethics and commitment among the Senior Management, sending a clear "zero tolerance" message with regard to bribery and other forms of corruption.
 - Performance of an evaluation of specific risks of bribery and other forms of corruption.
 - Establishment of proportional procedures that include controls, where required.
 - Performance of due diligence processes that include the analysis of third parties' assets and reputation (clients, suppliers, business partners, intermediaries, counterparties, and others), according to the processes or procedures established.
 - Monitoring and periodic review of controls, including the implementation of those established in this Policy.
 - Performance of training sessions on the **Companies'** culture of ethics and its position regarding bribery and other forms of corruption, as well as the rollout of related policies.
 - Promotion of the use of the **Companies'** Integrity Channel.
 - Establishment of sanctions in case of possible violations of this Policy.
- Failure to comply with this document involves sanctions, as per the laws in force and the **Companies'** Internal Regulations, that may lead to an end to the relationship with those found responsible. This may include violations of the applicable laws themselves, in which

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case those found responsible may be subject to civil or criminal actions brought by the competent authorities.

- It is impossible for this Policy to include all cases or situations that may arise. As such, it is important that the **Companies'** principles and values included in the Code of Conduct, the Money Laundering and Terrorism Financing Prevention and Management Manual, the Internal Work Regulations, and this Policy take precedence in all situations.

1. Relationships with Public Officials

Given the nature of the activities engaged in by the **Companies**, they interact with Public Officials on a regular basis as part of their operations.

The **Companies** accept and promote positive relations between their employees and such Public Officials as part of their work, provided they do not violate any of the principles established in this Policy or infringe on any laws, and they are free of any kind of pressure or intervention.

Bribery and other forms of corruption with public officials will not be tolerated by the **Companies**. Such acts are illegal, and run contrary to our standards of behavior and the way we do business.

1.1. Appropriate Relationships: GUIDELINES

- The **Companies** prohibit the giving or receiving of travel benefits or payments during the performance of the activities engaged in by the **Companies** to or from Public Officials. Any gifts or hospitality offered or given must be evaluated in accordance with the guidelines established in this Policy (see Section VII, Point 3).
- Any communication required in selection processes must be exchanged through a formal channel (SEACE Portal). For this reason, any direct request for quotation, fees, among others, from a public official or intermediary of a Public Entity that exceeds 8 Tax Units (UITs), must be expressly rejected and communicated through the Integrity Channel or to the mailbox of compliantnormativo@rimac.com.pe. If necessary, internal consultations should be made to the areas related to the State Insurance underwriting processes to confirm the existence of a potential selection process (in process or to be published).
- The employees must inform their immediate supervisor and the Talent & Transformation Division of any relation of kinship they may have with public officials, for which purpose they shall use the conflict of interest statement established in the Code of Conduct.
- In those cases where, for personal reasons or matters unrelated to the **Companies**, the employees are in attendance at the same meeting as a

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Public Official, none of the conversations in which they engage shall include topics aimed at obtaining improper benefits.

- Payments to government agencies, bodies, institutions, or entities, for any reason, shall always be made directly to the name of such entities, and not those of third parties. The reasons for which such payments may be received shall always be set forth in the corresponding Consolidated Administrative Procedures Text (TUPA) or a resolution authorizing the entity to collect and receive the payment. Additionally, the area in charge of the respective matter shall keep the receipts as proof of any payments made.
- All communications with public officials shall be made through formal channels or means, i.e., those means that allow records to be kept, especially where commitments are assumed, deadlines are established, or information is provided regarding any matters involving the company or its workers. In all cases, such communications shall be recorded or formalized and backed up by email, letters, or official letters.
- Formal meetings with Public Officials as part of the regular interaction therewith (performance of agreements, regulation, supervision, among others) must be held at the offices of the **Companies**, or, where this is not possible, at the offices of the public entity.
- Face-to-face or virtual meetings and inspection visits by Public Entities shall be accompanied by at least two (2) of the **Companies'** officers.
- The **Companies'** employees are required to report all violations or suspected violations of the Anti-corruption Policy through the Integrity Channel.
- Any doubts regarding the content or application of this Policy shall be handled by the Person in Charge of the Anticorruption Management System: cumplimientonormativo@rimac.com.pe

1.1.1. Meetings with Public Officials: GENERAL GUIDELINES

If there is a need to invite a public official or hold a meeting with him, whether in person or remotely, the following formalities must be complied with:

- i) At least two Rímac's employees must participate in the meeting.
- ii) The Person in Charge of the Anticorruption Management System must be notified at least 24 hours in advance about the meeting, using the Form contained in Annex 1 – Statement of Meeting with a Public Official, duly signed by the employees who will attend and by the Manager of the area.
- iii) If there were any deviations from the agenda items indicated in the Statement, this situation must be informed to the Person in Charge of the Anticorruption Management System, within the following two (2) business days.

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iv) Any face-to-face meeting must necessarily be held at the facilities of the **Companies** or at the premises of the entity whose official requests the meeting.

Excluded from this obligation are the interactions within the framework of an administrative sanctioning procedure, trilateral procedure and/or legal proceeding in which the **Companies** act as a party, and in general, any meeting that is held as part of the supervision activities of public entities. Similarly, meetings held as part of the Worksite marketing channel are excluded. Such channel will be subject to its own guidelines.

1.2. Inappropriate Relationships: PROHIBITIONS

The **Companies** strictly **prohibit** their employees, suppliers, counterparties or representatives from performing the following activities in interacting with public officials:

- Accept the offering or deliver to public officials: gifts, cash money, loans, invitations, preferred attention in an administrative procedure and/or settlement of a claim, settlement of a claim that does not meet the conditions of the policy, advantages in selection processes and, in general, any object (material or immaterial) that may yield an economic or other type of benefit for the Companies.
- Forward or disseminate confidential information related to a selection process of a Public Entity.
- Attempt to induce a public official to breach his/her duties, make decisions against the procedures or regulations in force, or perform any other illegal or unethical act.
- Make payment or grant a benefit to any individual or legal entity when it is known or there are reasons to suspect that all or part of the payment may be channeled to a public official.
- Induce, help or allow someone else to violate these rules.
- Make donations, directly or indirectly, to a public official.
- Improperly influence a public official to obtain from him/her a resolution that will benefit the Companies' interests.
- All prohibitions extend to the relatives of the public officials, provided that previous knowledge is taken of the kinship between them.
- Make invitations, promotional acts, seminars, training sessions, trips, sports and entertainment events and, in general, any invitation to public officials in

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order to obtain an undue advantage from them for the direct or indirect benefit of the Companies.

- Employees who are relatives of public officials must refrain from executing any lobbying act with them.
- Hold a face-to-face or virtual meeting with a Public Official of an Entity that has organized a bidding or selection process in which the Companies are taking part. Exceptionally, if there is a need to hold such a meeting, in addition to the provisions set forth in subsection 1.1.1, the signoff of the following officials must be obtained:

Employee	Signoff
Up to the Manager	Vice President
Vice President	Executive Vice President
Executive Vice President	General Management
General Manager	Executive Vice President of the Legal and Corporate Affairs Department

2. Underwriting Insurance for Public Officials

As part of the **Companies'** regular operations, they often interact with public entities and officials who use many of the products and services offered by the **Companies**. To keep such interactions from being construed as inappropriate, certain precautions must be taken.

Any product or service issued to a public entity or official, as well as the effective provision of said service, shall occur under conditions consistent with the regular policies, procedures, and processes defined by the **Companies**.

The position held by the public official may not, in any case, imply a situation of advantage for the taking out or renewal of the insurance offered by the **Companies**.

3. Gifts and Hospitality

It is strictly prohibited at the **Companies** to give gifts to public officials. Gifts and hospitality are understood to include the following:

- Cash payments.
- Personal gifts of any value.
- Undue benefits or advantages.

4. Representation Expenses

The **Companies** are committed to the responsible and appropriate use of those facilities allocated for travel and representation expenses. Such facilities may not be used to cover representation expenses by public officials, and shall always be handled in a transparent

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and reasonable manner in accordance with the applicable circumstances. At no time may such facilities be used as a means for the commission of acts of bribery or other forms of corruption.

5. Donations

The **Companies** are committed to the country's development and recognize the important work done by public institutions to guarantee the functioning of the State. Accordingly, the **Companies** may make donations under the following conditions and complying with the corresponding legal formalities, provided they are aligned with their objectives of social responsibility, sustainability, and reputation:

Cash Donations: In accordance with Section 69 of Law No. 28411—the General Act on the National Budget System, as substituted or amended, all cash donations shall be approved by a resolution issued by the head of the entity or a council agreement, in the case of Regional Governments, any by the municipal council, in the case of local governments, indicating the source of the donation and the destination of these public funds.

Non-Cash Donations: In accordance with the provisions established in Directive No. 001-2015/SBN "Public Personal Property Management Procedure," as substituted or amended, all personal property donations shall be approved by a resolution of the respective entity, approving the reception of the asset and its respective registration in the entity's property records and accounting books.

In the understanding that donations may be used as instruments to facilitate undue payments to officials, the following guidelines shall be considered so as to prevent them from being used for purposes other than those established:

- Any donation request for amounts of less than two (2) Tax Units (UITs) may be approved by an Executive Vice President (EVP);
- Any donation request for amounts equal to or greater than two (2) Tax Units (UITs) shall be jointly approved by the Sustainability Area, the EVP of the Legal and Corporate Affairs Division, and the EVP of the area leading the initiative.

6. Political Contributions

The **Companies** seek to carry out their activities without influencing, imposing conditions on, or interfering with the political pluralism of the societies where they operate. As such, the **Companies** do not may direct or indirect political contributions, and no employee or third party who may directly or indirectly represent the **Companies** may make such contributions on behalf of the **Companies**.

7. Procurement and contracting of Goods and Services

The **Companies'** employees must be careful and consider the risks of improper relationship with the suppliers of goods and services and between the latter and public officials.

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All employees interacting with these suppliers are under the obligation to exercise due diligence¹ to prevent the risk of bribery or other forms of corruption in carrying out procedures before **public officials** on behalf of the Companies.

The **Companies** shall contract with suppliers if there is a legitimate need for the goods or services they provide. Moreover, the contracting shall be carried out through fair and formal processes that include written anti-corruption clauses (e.g. contracts, service orders).

The procedures carried out by third-party “intermediaries” or “agents” or suppliers on behalf of the **Companies** (e.g. processing clerks, attorneys, consultants, agents, intermediaries, among others) could pose risks of bribery and other forms of corruption for the **Companies**. Therefore, the areas responsible for contracting them must carry out due diligence procedures to reduce the risk that such third parties make, offer or promise undue payments to public officials.

In this regard, the employees must be diligent in evaluating and selecting the suppliers and counterparties, and in the purchase of goods and services under their responsibility or those offered by the suppliers, to prevent that these transactions may be used or appear to be used to conceal bribery and other forms of corruption of public officials.

The **Companies** have implemented reinforced review processes and mechanisms for those suppliers and counterparties that, due to their nature or the nature of the goods or services provided, could expose companies to risks of bribery and other forms of corruption.

Additionally, the employees must remain vigilant to identify promptly any red flag of bribery and other forms of corruption in which the **Companies**’ suppliers and counterparties could be involved. These due diligence actions include:

- Check all the fees and expenses billed by “sensitive” third parties to confirm that they represent an appropriate and fair compensation for the legitimate services provided.
- Identify possible irregularities in the performance of the services or contracts, such as:
 - Unexpected expediting of processes or procedures, when longer terms were estimated.
 - Unexpected results of a process or procedure, when there were doubts over the success of the transaction.

¹ Refer to Point 3.1 of the Annex “Relationships with Suppliers” for further information on the due diligence procedures.

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- Avoid making payment to any person when it is known or there are reasons to suspect that all or part of the payment may be channeled to a public official.

8. Mergers and Acquisitions

As part of its expansion process, the **Companies** could acquire companies and businesses, provided that it carries out a special or reinforced due diligence process in order to determine whether the company or the persons related to it have been involved in illegal activities involving acts of bribery and other forms of corruption.

In order to carry out the due diligence process, the Companies shall consider at least the following guidelines:

- Identify the interactions that the target company has or has had with public entities or officials.
- Evaluate the reputational track record of the main shareholders and executives of the company to be acquired.
- Identify whether the company intended to be acquired has controls in place to mitigate the risk of bribery and other forms of corruption.
- The clauses and guarantees necessary to determine that the company acquired complies with the anti-corruption laws and to deny any liability for events occurred prior to the acquisition must be included in the contracts.
- Additional measures required in each case, if the acquisition is made.

9. Strategic Alliances and Joint Ventures

Before signing an agreement for the development of new business or an association agreement (e.g. Joint Venture), the **Companies** must conduct a special or reinforced due diligence process on the persons and companies involved in such agreements.

The formalization of the above-mentioned agreements shall include anti-bribery guidelines applicable to the contracting process (such as those mentioned in the preceding Section) and the establishment of post-contract control measures (e.g. anti-bribery audits) to mitigate any negative effect of violations on the part of the potential business partners.

10. Accounting Books and Records

The **Companies** are committed to developing, documenting, retaining and continually improving its internal financial controls to ensure that all of its payments are accurately recorded on the **Companies'** accounting books and records.

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All payments must be recorded in a correct and transparent manner. In this regard, all the records must be supported by documents such as receipts, orders or other applicable documents.

VIII. REPORTING IRREGULARITIES

If you are aware or suspect of a potential violation of this Policy, you must report it through the **Companies'** Integrity Channel. It should be noted that the **Companies'** Integrity Channel is managed by a renowned company specializing in the handling of this type of reports that is unrelated to the **Companies**.

The channels implemented to report irregularities include:

- Webpage: <https://www.canaldeintegridad.com/rimac/>
- E-mail: rimac@canaldeintegridad.com
- Call Center: 0-800-1-8114 (free number) and 219-7104, company code 2012.
- Voice mail: 0-800-1-8114 (free number) and 219-7104, option 2.
- Postal address and personal interviews: Av. Víctor Andrés Belaúnde 171, San Isidro, Lima 27, Lima-Peru. Attention: Mr. Rafael Huamán. Reference: Integrity Channel – RIMAC.

For inquiries, please contact us at: cumplimientonormativo@rimac.com.pe

The procedures have been established to ensure that these reports are investigated and that the appropriate actions are taken.

The **Companies** have a “non-retaliation” policy that protects those persons who report a potential or actual violation of this Policy. Furthermore, the reports may be made anonymously to the **Companies'** Integrity Channel.

All reports shall be treated on a confidential and anonymous basis.

IX. ANNEXES

1. GLOSSARY OF TERMS

- **Corruption Act:** Give, offer, promise, receive, grant, accept or solicit anything of monetary value or other benefits such as gifts, favors, promises or advantages of any kind for their own benefit or for the benefit of another person in return for performing or omitting an act related to their work or to influence a decision or to afford to, or receive from, an employee of the Company a favorable treatment.
- **Lobbying Act:** In accordance with Supreme Decree No. 120-2019-PCM, the Regulations to Law No. 28024 – Act that regulates lobbying in the public administration, it is an act intended to promote a person's viewpoints, in a

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transparent manner, in a public decision process, in order to guide such decision in the direction desired by such person.

- **Counterparty:** Individual or legal entity with whom the company maintains contractual links and who are not included in the definition of Clients or Suppliers indicated in Section 27 and 36 of Resolution 2660-2015.
- **Political Contributions:** Donations in cash or in kind made to contribute to a political activity.
- **Corruption:** Intentionally offer, pay, promise or authorize the giving of money or anything of value to a public official, political party, political party official or candidate, either directly or through intermediaries, for the benefit of such person or a third party, in order to induce such public official, political party, political party official or candidate to act or refrain from acting in relation to the performance of official duties, for the purpose of obtaining or retaining business or any other undue advantage.
- **Donations:** Monetary or in-kind resources given to support non-profit organizations, to promote education and culture, to provide social support or for another similar purpose without obtaining a commercial benefit in return.
- **Relatives:** Relatives up to the fourth degree of consanguinity and second degree of affinity.
- **Public Officials:** For the purposes of this policy, the definition of "Public Official" includes three categories of persons:
 - The officials of governmental agencies, regulatory entities, supervisory entities, public offices, State-owned companies, international organizations, and members of the Judiciary, Executive and Legislative Branches. The prohibition also applies to persons close to Public Officials, such as spouse, partner, fiancé/fiancée, relatives and the like ("close persons") and any other person receiving the promise, offer or benefit to influence the decision of a Public Official.
 - The political parties, supporters, and candidates to a political office.
 - The employees of public international organizations, such as Development Banks, the IMF, the UNO, the OAS, among others.
- **Intermediary:** Consultants, agents, advisors, external lawyers, representatives, lobbyists or other type of intermediaries who, both in the public and private sectors, perform an operation on behalf or at the request of RIMAC, in connection with their interaction with public officials, government entities, clients, suppliers, and third parties.
- **Anti-Corruption Laws:** Laws of the countries or markets where the **Companies** operate that prohibit the bribery of Public Officials.

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- **Bidding:** Process by which a Public Sector Entity calls a public tender or directly awards the acquisition of a good or service.
- **Facilitation Payments:** Small payments made to public officials, usually low-level officials, for the purpose of expediting or guaranteeing a non-discretionary, routine or law enforcement government action.
- **Gift:** Money, goods, services, loans or other benefits.
- **Anti-corruption Management System:** It is a collection of all the policies, procedures and controls against bribery and other forms of corruption included in this policy.
- **Bribe:** Offer, promise, delivery, acceptance or solicitation of an undue advantage of any value (of a financial or non-financial nature), directly or indirectly, regardless of its location, in violation of the law, as an incentive or reward for a person to act or omits to act in relation to the performance of such person's obligations.
- **Business Partners:** An external party with which the Company maintains or plans to establish any type of business relationship. The definition of Business Partner includes, but is not limited to, clients, consumers, "business alliance", business alliance partners, consortium members, external suppliers, contractors, consultants, subcontractors, suppliers, vendors, advisors, agents, distributors, representatives, intermediaries, and investors. This definition is intentionally broad and should be interpreted according to the risk profile.

2. RED FLAGS

A significant number of red flags may justify a more detailed due diligence review. Such red flags can be identified during different business activities, including: the contracting of intermediaries, acquisitions or investments in a target company, general business activities, gifts, charitable contributions, among others.

Below is a non-exhaustive list of the red flags that the **Companies'** employees must consider in performing their duties and report immediately to the Person in Charge of the Anticorruption Management System, the Compliance Committee or their immediate supervisor if any is identified:

- The third party was recommended by a Public Official or a politically exposed person.
- An employee, director or owner of the third party is a politically exposed person.
- There are records (e.g. news, complaints, among others) that a business partner has been involved in acts of bribery and other forms of corruption or other illegal, corrupt or unethical practices.

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- An employee of the Company has a close business, personal or family relationship with a government official who has discretionary authority over the business or transaction in question.
- The Business Partner (e.g. client, supplier, potential associate company) has a business that appears to be poorly equipped or have insufficient equipment to develop the proposed project.
- The Business Partner (e.g. client, supplier, potential associate company) is reluctant to reveal the identity of its shareholders or partners.
- The Business Partner (e.g. client, supplier, joint venture, associate company) requests that its identity or, in the case of a company, the identity of the partners or shareholders not be revealed.
- The Business Partner requires payment of a commission or a significant portion of the fees or income before or immediately after being awarded the contract that is not in accordance with the market or the work done or agreed.
- The Business Partner (e.g. supplier, associate company) plans an extensive use of subcontractors for the relationships with public officials.
- Unusual contractual terms are required.
- Cash payments, advances, payments to an individual or entity different from the individual or entity contracted, or payments in a country that is not the main country of business or where the individual or entity provides the services, are requested.
- Pre-payments that cannot be commercially justified with respect to the services provided.
- Unjustified adjustments are made to the fees requested during the contracting process, particularly around the time of awarding of the contract.
- The value of the contract is particularly high and not in proportion to the project.
- Invoices not sufficiently detailed or substantiated.
- The client suggests or requires, without a justified reason, that an offer or contract negotiation be carried out through a specific intermediary.
- The apparent need to hire an intermediary arises just before or after the awarding of the contract.
- The Business Partner (e.g. client, supplier, potential associate company) is insolvent or is going through serious financial distress.

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- The Business Partner refuses to certify that it will not take any action that may cause the **Companies** to violate the anti-corruption laws.
- The Business Partner refuses to agree in writing that it will not make any transfer to public officials other than those authorized by the **Companies**.
- The Business Partner refuses to comply with the Prevention Program implemented by the **Companies** or with the local anti-corruption laws, or to include anti-corruption issues in its internal training programs, or to collaborate with the compliance training program of the **Companies**.
- A costly gift or entertainment is proposed in close proximity to a bidding process or the awarding of a contract.
- A Business Partner requests that a job or an internship be offered to a particular person. The person who makes the request is a public official and the potential employee is known to be a relative of the public official.

3. DUE DILIGENCE PROCEDURE

3.1. Relationships with Suppliers

The **Companies** reserve the right not to engage in business relationships with suppliers suspected of, or being investigated for, bribery of public officials or with suppliers that may endanger their reputation and that of their employees.

A supplier is understood to be any individual or legal entity, whether customary or occasional, national or foreign, with which the **Companies** establish or maintain business relationships for the acquisition of products and/or services.

The **Companies'** employees must be diligent in evaluating the purchases of goods and services under their responsibility. Accordingly, employees must:

- a) Request more than one quote, which must contain the technical and economic details of the proposal.
- b) Document supplier background.

The area employees receive the goods and services from the suppliers and are responsible for checking all the fees and expenses billed by third parties to confirm that they represent an appropriate and fair compensation for the services or goods supplied. Furthermore, they must provide the Accounting or the Person in Charge of the Anticorruption Management System with sufficient information when requested to do so for the proper accounting of the payments made or for verifying any transaction, respectively, without prejudice to the duties pertaining to the Logistics and/or Management Area.

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If the purchase and/or service are approved, an anti-corruption clause must be included in the respective agreement. Such clause shall contain at least the following points:

- a) Commitment to act in observance of the Code of Conduct and this Policy.
- b) Prohibition to solicit or accept any type of bribes.
- c) Commitment to supply information and undergo audits by the **Companies**, if so required, if it is a long-term relationship.
- d) A clause establishing the termination of the contract if these provisions or agreements are breached.

3.2. Relationships with Institutional Clients

Within the limits set by the legal framework in force, the **Companies** avoid engaging in business relationships with institutional clients which are known, officially and through written means, to have been judicially declared guilty of the crimes in question and the crime of bribery.

An institutional client is understood to be any customary or occasional, national or foreign legal entity with which the **Companies** establish or maintain business relationships.

The decision to accept and/or maintain a business relationship with an institutional client that do not meet the above-mentioned conditions must be approved expressly and in writing by the General Manager or the person to whom this function has been delegated.

During the course of the business relationship, the employees must remain vigilant, while discharging their duties, to identify any red flags in connection with unusual behaviors by institutional clients and report them in a timely manner to the Person in Charge of the Anticorruption Management System.

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ANNEX 1 STATEMENT – MEETING WITH A PUBLIC OFFICIAL

Remember that this form must be delivered at least 24 hours in advance of the meeting

Employees' Details (at least 2):

Father's last name		Mother's last name	
Name			
Identity Card Number			
Division		Area	

Father's last name		Mother's last name	
Name			
Identity Card Number			
Division		Area	

Information:

Full name of the public official	
Public entity where he/she works	
Position held	
Place of meeting	
Date and time of meeting	
Meeting agenda items	<ul style="list-style-type: none"> • • •

By signing this document, I declare that I am familiar with and comply with the guidelines set forth in the Anticorruption Policy in force.

The following considerations must be considered:

- Face-to-face meetings must be held only in the premises of Rímac or the entity.
- In all face-to-face or virtual meetings, the attendance of at least two (2) Rímac employees is required.
- If there were any deviations from the agenda items indicated in the Statement, this situation must be informed to the Person in Charge of the Anticorruption Management System, within the following two (2) business days.

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Employee 1	Employee 2

Area Manager's signoff	Vice President's / Executive Vice President's signoff **	General Manager's signoff **

** If applicable

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IX. APPROVAL FLOW

Stage	Area	Position	Name
Preparation / Update	Regulatory Compliance	Regulatory Compliance Manager	Analí Castro
Approvals 1 and 2 (Contents)	Anticorruption Management System	Person in Charge of the Anticorruption Management System	Maria Nieves Pereyra Grande
Approval (Methodology)	Process Management	Business Process Engineer ROLE: Document Management Administrator	Angelka Machay
Approval Operational Risk / CGIR	Operational Risk Management	Head of Operational Risk Management	Carlos Higa
Publication	Comprehensive Risk Management Committee / Board of Directors	Head of Operational Risk Management	Carlos Higa
Publication Management	Process Management	Business Process Engineer ROLE: Document Management Administrator	Angelka Machay

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X. CHANGE CONTROL

DOCUMENT CREATION			
PREPARATION DATE	DESCRIPTION	V	PREPARED BY
July 24, 2018	Initial document approved by the Board of Directors	01	Poul Carrillo/Fiorella Zelvaggio
August 27, 2019	Adaptation to new regulatory guidelines and resolutions adopted by the Compliance Committee and approved by the Board of Directors	02	Mario Izaguirre
April 23, 2020	Update of criteria for meetings with Public Officials and of the Annex	03	Analí Castro/Fiorella Zelvaggio
May 27, 2020	Incorporation of guidelines related to selection processes and confidential information. Modification of guidelines related to the approval of Donations to Public Entities.	04	Analí Castro/Fiorella Zelvaggio
November 15, 2021	Incorporation of guidelines regarding the settlement of claims to public entities and updating according to the new structure of the company	05	Analí Castro/María Nieves Pereyra