

CODE OF CONDUCT

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CODE OF CONDUCT

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Message from the Chairman of the Board

Andino Investment Holding S.A.A. (AIH) is a corporation with several affiliate companies that have more than four decades of national and international market experience. During the past few years, this business conglomerate has grown in a continuous and sustainable way, and has thus bolstered Peruvian foreign trade. One of our holding company's greatest concerns, including that of its affiliates, has always been to offer the best services to our customers while maintaining a profound sense of social responsibility. Undoubtedly, this commitment is possible thanks to each and every one of our collaborators—our team—, the source of our main strengths.

The entire ANDINO Group and its affiliates are comprised by hundreds of collaborators who make up a large family. To develop our diverse businesses, we all have the firm commitment to act permanently and coherently with our organization's pillars and ethical principles, which are endorsed by the Management and the Board of Directors.

This updated Code of Conduct reinforces ANDINO Group commitments and principles, and clearly presents these as a reminder of how we must always behave on a daily basis. The Code of Conduct should serve ANDINO Group leaders and in each of its affiliates as a means of value transmission and training, and as an instrument of permanent consultation for all employees. The Code of Conduct seeks to encourage collaborators within the Andino Group and/or its affiliates to work honestly and in strict compliance with laws and regulations. Furthermore,

these activities should be carried out in a way that no personal advantage is sought to the detriment of the company.

This Code of Conduct is aligned with the highest standards in this regard, but—above all—it is consistent with our business vision and our role as part of Peruvian society. We ultimately strive to foster a fairer and more ethical society that allows us to create a better reality for present and future generations. Let's ALL be part of this way of acting accordingly!

Wolf Dieter Krefft Berthold

ANDINO Chairman of the Board

Lima, November 2019

Chapter I: Corporate Governance

In line with the good practices of Corporate Governance of Andino Investment Holding S.A.A. (ANDINO), the Board of Directors and the Audit, Ethics, Corporate Governance and Compliance Committee of ANDINO are the highest level bodies to make decisions regarding the implementation and supervision of compliance with this Code of Conduct. In this sense, they shall take the necessary measures so that those who perform functions for ANDINO, such as the members of the Board of Directors, Managers and collaborators, as well as any person (natural or legal) that is linked to ANDINO, know, understand and apply the provisions of this Code.

The Management and the Compliance Officer are responsible for implementing the rules and procedures necessary to ensure compliance with the provisions of this Code, for which they shall take the necessary measures for the dissemination and understanding of those who must comply with it. Such measures include the participation of the corresponding management to comply with the indicated (for example, the Human Resources Management in the case of those who perform functions for ANDINO and for customers, suppliers, and other interested parties, the Managements responsible for hiring or linking them).

The Compliance Officer will resolve issues relating to the interpretation of this Code that cannot be satisfactorily addressed through the normal channels of supervision, having direct access to the Audit, Ethics, Corporate Governance and Compliance Committee. The Compliance Officer shall inform the Corporate Internal Auditor of the cases of non-compliance with the Code of Conduct, who shall keep a record of such cases, in order to follow up on the attention and solution of such cases as indicated in this Code and/or the Internal Work Regulations. The Corporate Internal Auditor has as a reporting line to the Audit, Ethics, Corporate Governance and Compliance Committee, to whom he will report the status of the cases of noncompliance.

ANDINO has channels of denunciation (Ethics Line), which allows any person to register denunciations of any illegal or unethical behavior that does not comply with this Code, guaranteeing the confidentiality of the denouncer. The channels of

denunciation are provided by an external company and without connection with ANDINO, assuring the independence, confidentiality and fulfillment of the protocol established to assure the due and opportune attention of the received denunciations. The Corporate Internal Auditor will monitor the proper functioning of the channels of complaint and compliance with established protocols; also, will inform the Audit, Ethics and Corporate Governance Committee the status of the complaints received.

Chapter II: **General Provisions**

Article 1: Introduction

This Code of Conduct represents a set of essential principles that define the behavior of all ANDINO Directors, Managers and collaborators, as well as of any natural or legal person that establishes a link with ANDINO. This Code of Conduct guides the actions, culture and organizational identity that marks the activities of our business, contributing in this way to maintain a relationship of trust with our customers, shareholders, suppliers, employees and other stakeholders.

What is the correct conduct according to this Code?

ANDINO interacts and maintains commitments with a variety of people and other companies. In this sense, the image of ANDINO as a company depends on how the Directors, Managers and collaborators act in the development of their functions as well as outside the work environment, understanding that a correct conduct is inherent to the actions of people not only in the work environment. However, making correct decisions is not always an easy task; sometimes we will be under pressure or feel unsure about what to do. When faced with a difficult decision, it may be helpful to ask the following questions:

- Is my action or decision legal?
- Do they comply with the values and provisions presented in this Code of Conduct?
- Is it free of any personal conflict or conflict of interest?
- Is it setting a good example to other employees?
- Would we feel comfortable with our decision/behavior if it were exposed in the public media?

If the answer is "No" to any of these questions, you should suspend all action and seek help from the person with the next highest rank. If there is still any doubt, we may turn to the Compliance Officer at any time. Likewise, if we observe any activity performed or to be performed by another person who has a negative answer to any of the above questions, we should also report it; likewise, if we receive an order from a Director, Manager or collaborator that leads to the violation of the provisions of this Code of Conduct, it should not be complied with, and such situation should also be reported.

In case we do not feel comfortable or safe raising the concern to other people, at any time we can resort to the Ethics Line (reporting channels) to anonymously ask

help with queries or to report any situation that is against the rules of this Code of Conduct. See channels for reporting available in CHAPTER VII.

Article 2: Objective and purpose

The Code of Conduct has the objective of establishing in a generic way the principles, responsibilities and rules of conduct that guarantee that ANDINO Directors, Managers and collaborators develop their professional and personal activities within the ethical and moral principles, within the legal norms in force, ensuring that the company's activity is surrounded by the necessary security and transparency to prevent it from being used as an instrument to commit any crime, including money laundering and financing of terrorism, and/or that any Director, Manager or collaborator commits such crimes on behalf of ANDINO in addition to those related to bribery, collusion and influence peddling, among other acts that do not comply with the laws in force in Peru and where ANDINO carries out activities. In this sense, the ANDINO Code of Conduct has the purpose of preserving its values in all activities.

Article 3: Scope

This Code of Conduct is applicable without exception to:

- ANDINO Directors (whether acting individually or collectively), Managers and collaborators.
- Any natural or legal person that acts on behalf of ANDINO
- Any natural or legal person that establishes a link with ANDINO as a client, supplier or counterpart.

Article 4: Definitions

For the purposes of this Code of Conduct, the following definitions shall apply:

- a. Sexual Harassment: Watching, pursuing, harassing, stalking or seeking to establish contact or closeness with a person, without that person's consent, in order to carry out acts with a sexual connotation.
- b. Senior Management: Person or group of persons who manage a company at the highest level. They are responsible for the management of the company's complete organization.
- c. High level of integrity: Refers to the concept of moral suitability, which includes the knowledge of the inexistence of negative antecedents of personal, labor, patrimonial character and credit history of the collaborators.
- d. Client: Any natural or legal person, national or foreign, with which commercial relations are established or maintained for the presentation of any service or supply of any product typical of the activity of ANDINO.
- e. Bribery: Crime typified in the articles 397, 397-A and 398 of the Penal Code, according to which it includes offering, granting or promising to an official or public servant inside or outside Peru or official of a public international organization donation, promise, advantage or undue benefit for his own benefit or in that of another person, so that he carries out or omits acts

- proper to his position or employment, in violation of his obligations or without failing in his obligation to obtain some undue benefit.
- f. Collaborator: Any person who, regardless of the labor or contractual regime, develops permanent activities in or for ANDINO.
 - g. Collusion: Crime typified in Article 384 of the Criminal Code, according to which it occurs when the official or public servant, intervening directly or indirectly, by reason of his position, in any stage of the modalities of acquisition or public contracting of goods, works or services, concessions or any operation in charge of the State, agrees with the interested parties to defraud the State or State entity or organism.
 - h. Counterpart: Natural person (with business) or legal entity with which the company has contractual links and that are not incorporated in the definitions of customers or suppliers.
 - i. Financing Terrorism: Crime typified in Article 4-A of Decree-Law 25475, as amended by Law 29936.
 - j. Corporate Governance: System (set of rules, principles and procedures) by which companies are directed and controlled. Corporate Governance structure specifies the distribution of rights and responsibilities among the company's different parties, such as the board of directors, managers, shareholders and others that maintain some interest in the company. Corporate Governance also provides the structure through which the company's objectives are established, the means to achieve these objectives, as well as the parameter to monitor its performance.
 - k. Stakeholder: Natural or legal person that can affect the achievement of the company's objectives or that can be affected by the achievement of these.
 - l. Sexual harassment: Sexual or sexist violence or connotation that is not desired by the person against whom it is directed, that can create an intimidating, hostile or humiliating environment; or that can affect their activity or work situation. Examples of sexual harassment include, but are not limited to:
 - An implicit or expressed promise to the victim of preferential or beneficial treatment with respect to his or her present or future situation in exchange for sexual favors.
 - Threaten the victim and demand, implicitly or explicitly, an unwanted response that violates or is detrimental to his or her dignity.
 - Use of terms of a sexual or sexist nature or connotation (written or verbal), sexual advances, sexual propositions, obscene gestures, or display of images of a sexual nature by any means that are unwelcome, hostile, humiliating, or offensive to the victim.
 - Bodily approaches, rubbing, touching or other physical conduct of a sexual nature that is offensive and unwanted by the victim.
 - Offensive or hostile treatment due to the rejection of the above-mentioned behaviors
 - m. Laundering of assets: A crime typified in Legislative Decree 1106, Legislative Decree for the Effective Fight against Laundering of Assets and other crimes related to Illegal Mining and Organized Crime, and related law amendments.

- n. ML/TF or Money Laundering and Terrorism Financing: For this Code, it refers to the possibility that ANDINO is used by third parties as a means to commit the crimes of Money Laundering and/or Terrorism Financing.
- o. Prevention Model: An ordered system of rules, mechanisms and procedures of prevention, surveillance and control, implemented voluntarily by the company, aimed at reasonably mitigating the risks that Directors, Managers and collaborators commit, during the exercise of their functions, the crimes of bribery, terrorism financing, money laundering, collusion, influence peddling and other crimes typified by Peru's laws and/or where ANDINO operates. Likewise, the prevention model promotes integrity and transparency in the company's management.
- p. Compliance Officer: Natural person designated to oversee the adequate implementation and operation of the ML/TF prevention system and the Anti-Corruption Prevention Model.
- q. Operation: Any act or contract with respect to which a good is transferred or a service is provided that is specific to the activity of ANDINO.
- r. Unusual Operations: Operations carried out or that have been tried to carry out whose amount, characteristics and periodicity are not related to the economic activity of the client, or exceed normal market parameters or don't have an evident legal foundation.
- s. Suspicious Operations: Operations carried out or that have been attempted, whose amount or characteristics are not related to the economic activity of the client or that do not have an economic basis; or that, due to their number, amounts transacted or the particular characteristics of these, may reasonably lead to the suspicion that the company is being used to transfer, handle, take advantage of or invest resources coming from criminal activities or destined for their financing.
- t. Governing body: Group or body that has the responsibility and final authority over the activities, governance and policies of an organization, and to which senior management reports and for which it is accountable.
- u. Administrative body: Group or body in charge of the administration, management and representation of the legal entity, carrying out the acts inherent to its corporate purpose.
- v. Supplier: Any natural person (with business) or legal entity that supplies products or services or that issues a payment receipt for the payment of the referred goods and/or services.
- w. Traffic of influences: Offense defined in Article 400 of the Criminal Code, according to which it consists of invoking or influencing to receive, give or promise for oneself or for a third party, donation or promise or any other advantage or benefit with the offer to intercede before an official or public servant who has to know, is knowing or has known a judicial or administrative case.

Article 5: Legal Basis

This Code of Conduct has as legal basis and abides to the following regulations:

Laws to Prevent Companies from being used for ML/TF and laws of Personal Data Protection:

- a. Legislative Decree 1106, Legislative Decree for the Effective Fight against Money Laundering and other crimes related to illegal mining and organized crime.
- b. Legislative Decree 985 and Law 29936, amending Decree-Law 25475, which establishes the penalty for the crime of terrorism and the procedures for investigation, instruction, and trial, in order to punish the crime of financing terrorism.
- c. Law 29733, Law on the Protection of Personal Data.

Laws to Prevent Corruption in Companies:

- a. Law 30424, Law Regulating the Administrative Responsibility of Legal Entities for the Crime of Active Transnational Bribery.
- b. Legislative Decree 1352, Legislative Decree that Extends the Administrative Responsibility of Legal Entities.
- c. Law 30835, Law that Modifies the Denomination and Articles 1, 9 and 10 of Law 30424, Law that Regulates the Administrative Responsibility of Legal Entities for the Crime of Transnational Active Bribery.
- d. Supreme Decree 002-2019-JUS, Regulations to Law 30424, Law Regulating the Administrative Liability of Legal Entities.

This code also complies with the standards defined in:

- a. Internal Work Regulations.
- b. Internal Regulation of Security and Health in the Workplace.
- c. Manual of Prevention and Management of the Risks of Money Laundering, Financing of Terrorism, Bribery, Collusion, Influence Peddling, and other crimes in the scope of the Peruvian legislation and in general where ANDINO operates.
- d. Others of legal necessity or compliance with national and international standards necessary for the operation of ANDINO (for example, security and quality certifications among others, if any).

Article 6: Validity and Derogation

This Code of Conduct will start to be in force from the day of its publication and internal diffusion within ANDINO, once approved by the Board of Directors and, with the entry into force of this Code, the previous one will be without effect.

The Code of Conduct was approved by the Board of Directors' Meeting Agreement of November 28, 2019.

Article 7: Dissemination

The Compliance Officer shall communicate this Code of Conduct, as well as the laws, regulations, internal provisions, manuals and other information considered relevant, among ANDINO's collaborators, according to the type of activity or specific function of each one. Likewise, he or she shall provide each one of them with a copy of the Code of Conduct in compliance with the rules on the matter, in order to facilitate compliance with the same.

The adequate communication and reception of the Code of Conduct will be accredited with the subscription by the collaborator of the "Commitment to Conduct Code Compliance" (Appendix I).

On the other hand, the knowledge of this information will be accredited by means of training certificates. Both documents will be filed in each collaborator's file.

Article 8: Compliance

Directors, Managers, as well as all employees with dependents must be models of ethical conduct and compliance with this Code. Accordingly, each person is responsible for:

- Ensuring that the people they supervise understand the responsibilities derived from the Code of Conduct and other Company policies.
- Taking opportunities to discuss and reinforce the importance of ethics and compliance.
- Creating an environment where Directors, Managers, employees and other parties within the scope of this Code feel comfortable to raise concerns without fear of reprisal.
- Assessing compliance behaviors in relation to the Code of Conduct and other Company policies when evaluating performance.
- Not encouraging nor giving orders that deliver business results at the expense of unethical conduct or for failure to comply with this Code or the law.
- Proactively minimizing risks of non-compliance with the Code of Conduct or the law in all cases they observe and/or identify.
- Consulting their immediate supervisor or Compliance Officer if in doubt about an action or decision to be taken in order not to incur in a breach of this Code.

Any natural or legal person that establishes a link with ANDINO and is within the scope of this Code must comply with it. Violation of this Code may result in the imposition of disciplinary sanctions in proportion to the seriousness of such violations as regulated in the Internal Labor Regulations and the laws in force, which may include dismissal or termination of the business relationship, as deemed appropriate, and/or legal actions that may follow the dismissal or termination of business.

If any procedure, rule or regulation stipulated in the Code of Conduct contradicts the applicable law, the law shall always govern the Code. In this sense, the ANDINO Code of Conduct is aligned with all Peruvian legislation without exception and its sanctions are applied within that legal framework. Likewise, it will conform to the legislation of the countries where it could develop business; in this sense, the Code of Conduct promotes:

- Respect for human dignity.
- The fair and respectful treatment of people.
- People's freedom.
- The rejection of discrimination on the following grounds: race, religion, nationality, ethnic origin, color, sex, gender identity, age, citizenship, sexual

orientation, marital status, disability, or any other characteristic protected or not by law.

- Freedom of expression.
- Fair labor practices and within the legal framework.
- Non-hiring minors.
- The compliance with environmental standards.
- Corporate social responsibility.

Chapter III: **Values, Principles, and Duties**

Article 9: Values

ANDINO Directors, Managers and collaborators, must act, in the exercise of their activities, under the following values:

- **Reliability:** Fulfilling what is said and offered, being responsible for their decisions and actions.
- **Integrity:** Always act in a correct and ethical way in all circumstances and context, proactively assuming actions that ensure compliance.
- **Excellence:** To work with the highest possible quality standard in a permanent search for superior performance.
- **Teamwork:** Assume the commitment to achieve results through coordinated work while respecting differences of opinion.
- **Safety:** To proactively perform work in a safe manner to protect one's life, as well as the lives of others.
- **Respect:** Execute, act and communicate as I would like to be treated.
- **Proactivity:** Take initiatives to improve work activities and assume responsibility for the achievement of results in an active way, with initiatives in the development of creative actions that generate improvements.
- **Honesty:** To express oneself with sincerity and coherence, respecting the values of justice and truth.

Article 10: Principles

These are the basic precepts that must govern the daily performance of ANDINO's collaborators:

- **Respect:** To the honorability of people, co-workers, customers, suppliers and friends.
- **Loyalty:** To the company and its principles, offering the maximum effort for the achievement of its objectives.
- **Honesty:** To act with transparency, rectitude, responsibility and professionalism as a response to the trust placed in us by the company.
- **Confidentiality:** To protect the company's and third party information entrusted to the company, and to remember that all operations performed and the identity of the Compliance Officer must not be disclosed.
- **Integrity:** To frame our labor and personal actions for the benefit of lawful activities.
- **Truthfulness:** Always express the truth in the exercise of daily activities, rejecting subterfuge and lies.

- Impartiality and Objectivity: To evaluate the information that could be linked to illicit activities, with the conviction that silence can damage the company and the community, but bad information can affect an innocent person.

Article 11: Duties and Obligations

ANDINO Directors, Managers and collaborators shall comply with the provisions of this Code with the purpose of maintaining at all times an ethical behavior and prevention against the crimes of money laundering, terrorism financing, bribery, collusion, influence peddling and other crimes contemplated in the Peruvian legislation and of the country where ANDINO could carry out operations; being specially obliged, according to the scope of their functions, to:

General duties and obligations:

- a. To ensure that a high level of integrity is maintained.
- b. To gather information on the personal, labor, patrimonial and credit history of the collaborator, which will be recorded in his/her personal file, in order to guarantee the transparency of the information provided; this must be updated annually, if necessary.
- c. To inform the corresponding instance of any change or unusual modification noticed in the behavior of collaborators under supervision, as well as of the facts or situations that deserve such qualification, provided that they are of his or her knowledge.
- d. Comply with training in the prevention of ML/TF and in the anti-corruption laws included in the Prevention Model, at least once a year. Likewise, it is mandatory to attend the trainings programmed by ANDINO on subjects required for the correct and/or safe execution of functions and/or as a legal or accreditation requirement.
- e. Contribute in the process of implementing, verifying and controlling the adequate functioning of preventive measures, keeping the Compliance Officer informed.
- f. Comply, in a mandatory way, with the procedures that integrate the ML/TF Prevention System, the Crime Prevention Model and all those procedures implemented and communicated by the Management as part of the administration executed in each area of ANDINO.
- g. Avoiding and controlling the presence of conflicts of interest, which is why compliance with ethical principles must be given priority in order to achieve business goals.
- h. To observe and act according to the values and ethical principles stated in the previous articles.

Regarding the risk of ANDINO being used by third parties to commit ML/TF crimes:

- i. To register and fully identify the clients with whom ANDINO will be related or is related, be these natural persons (with business) or legal entities, national or foreign, requiring the exhibition of the corresponding identity document and credentials.

j. Establish the documentation requirements for the adequate identification of the client, verifying it if necessary.

k. To be attentive to changes in the usual behavior of clients, which allow detecting operations that, due to their number, amount or characteristics, rationally suggest a deviation from the profile of the client's activity or from any news about the operations carried out, not carried out or inconclusive that are complex, unusual, significant, not usual and not significant, but periodic, that do not have a clear economic or legal basis.

l. Identify typologies of money laundering and terrorism financing, as well as warning signals that have not been considered in the Manual, and communicate them to the Compliance Officer. Thus, remaining involved and aware of the risks that permissive conduct may entail.

In relation to the risk that ANDINO Directors, Managers and/or collaborators are involved in the crimes of ML/TF, bribery, collusion, influence peddling and other crimes contemplated in the Peruvian legislation and of the country where ANDINO could carry out operations:

m. To elaborate and maintain updated a prevention model that contemplates actions to prevent, detect and mitigate the risk of Directors, Managers and collaborators getting involved or being involved in acts of corruption related to the crimes of money laundering, terrorism financing, bribery, collusion, influence peddling and other crimes that are incorporated in the framework of Law 30424, Law that regulates the administrative responsibility of legal persons, and its amendments.

n. The prevention model must promote integrity and transparency in the management of ANDINO and its elaboration must contemplate the suggested elements and principles indicated in the Supreme Decree 002-2019- JUS, Regulation of Law 30424, Law that Regulates the Administrative Responsibility of Legal Entities. The principles for the design, approval, implementation, monitoring and improvement of the prevention model are the following:

- **Accessibility:** the policies, actions, procedures, strategies that make up the prevention model, as well as the support materials that are easily accessible and formulated in clear and understandable language, in order to facilitate access, promotion and knowledge of the model among collaborators and other stakeholders (clients, suppliers, joint ventures, investors, among others).
- **Adaptability:** The policies, actions, procedures and strategies that make up the prevention model that are adapted to the nature, needs, size, structure, geographical operations, business model and other specific characteristics of the company, based on the risks to which it is exposed, in each specific case.
- **Commitment and leadership:** The maximum organs of government, of administration and the company's senior management, are responsible for leading the implementation and suitable operation of the prevention model through their commitment and firm, active and visible support.

- **Continuity:** The prevention model is a continuous process, which permanently adapts to changes in the business environment and the company.
- **Documentation:** The company documents and evidences the processes, the controls, the risk assessment and the results of that evaluation, as well as all the elements that support that the prevention model works properly.
- **Efficiency:** The company must adequately employ and optimize its resources for the design, approval and implementation of the prevention model, in order not to incur in unnecessary costs and burdens that may jeopardize its efficiency, effectiveness, and sustainability.
- **Continuous risk evaluation:** It implies the identification, assessment and continuous monitoring of risky activities, as well as those that may increase or create new risks, knowing their consequences, as well as assessing the existence of factors that may prevent criminal action or mitigate the risk of its commission.
- **Independence:** The prevention and compliance function is vested with the maximum independence, so that the decision making and actions taken by the prevention officer (function performed by the ML/TF Compliance Officer in case a different person is not appointed) cannot be conditioned by issues or assumptions that prevent or hinder him from performing his functions.
- **Proportionality:** The controls implemented by the company are proportional to the level of risk, to the probability of criminal acts and to their potential effects.
- **Advertising and preventive communication:** The company, regardless of its size and capacity, informs its programs, policies and practices to prevent crimes to its employees and, when appropriate, to other interested parties (customers, suppliers, joint ventures, investors, among others). This does not imply disclosure or duty to report on issues that threaten or may threaten the company's interests.
- **Reason:** the controls implemented by the company have the reasonable possibility of preventing, detecting and mitigating the risks of crimes.

If as a result of the above, any transaction is identified as unusual, or is suspected of being so, the Compliance Officer must be informed immediately, so that he may proceed to evaluate it as a suspicious transaction and, if so, submit such situation to the General Management and the Audit, Ethics, Corporate Governance and Compliance Committee to determine the corresponding actions.

The Audit, Ethics, Corporate Governance and Compliance Committee is responsible for conducting periodic reviews and making any necessary updates to the Code.

Chapter IV: Information Management

The information generation process must be aligned with organizational values. When generating information, collaborators must take into account the following elements: relevance, precision, opportunity and punctuality, accessibility, transparency and coherence.

ANDINO does not allow and sanction the delivery of false information, unjustifiably late, or the concealment of relevant information for any of the stakeholders.

Special care must be taken with the treatment of personal data of all our stakeholders according to the provisions established in Law 29733 - "Law on Protection of Personal Data" (hereinafter LPPD) and its Regulations in force, which establish:

a. Consent of the holders of the personal data for the treatment or transfer of their personal data.

- The treatment or transfer of personal data will require the express and unequivocal consent of the affected party, unless otherwise provided by law.
- The consent granted by the owner and/or legal representatives shall be included within the characteristics established in the LPPD.
- The consent may be revoked when there is a justified cause for it and no retroactive effects are attributed to it.
- In cases where the consent of the affected party is not required for the processing of personal data, and provided that a law does not provide otherwise, the affected party may oppose the processing of such data. In such case, the company will exclude the data related of the affected person.

b. To inform the holders of personal data about the management of these, even when the data are not obtained of the holders of the personal data

- The company will always inform to stakeholder of the possibility of exercising the rights of access, rectification, cancellation and opposition (ARCO), and of the company area that exercises such rights.
- The company will always inform stakeholders of the possibility of exercising the rights of access, rectification, cancellation and opposition (ARCO), and of the company area that exercises such right.
- Personal data protection clauses will be established with respect to the information obtained from contractual relations with other companies, which will have the purpose of protecting personal data, through organizational, technical and legal security measures in accordance with the LPPD.
- Personal data protection clauses will be in accordance with: (i) obtaining the consent of the holders of personal data and the processing or transfer of their personal data. (ii) informing about the treatment of their personal data, whose holders have not given their data directly. (iii) procedures and applicability of ARCO rights; and, (iv) other clauses in accordance with the protection of personal data and confidentiality, if required.
- When personal data have not been collected from the interested party, the latter shall be expressly, precisely and unequivocally informed by the company within three (03) months from the time of registration of the data, unless he has been previously informed of the content of the treatment, of the origin of the data, of the possibility of exercising the rights of access, rectification, cancellation and opposition, and of the identity and address of the person responsible for the treatment.

For the exercise of their rights of information, access, rectification, cancellation and opposition those affected may make use of the "ARCO Rights Application Form",

which will contain the necessary data and procedures and which may be requested directly from the Legal Department.

Chapter V: Failure to Comply with Code of Conduct Provisions and Its Disciplinary Measures

Article 12: Non-compliance with the provisions included in this Code regarding money laundering, terrorism financing, bribery, collusion, influence peddling and other crimes contemplated in the Peruvian legislation and of the country where ANDINO could carry out operations.

ANDINO Directors, Managers and collaborators who do not comply with the values, principles, duties, obligations and other provisions of this Code of Conduct will incur in labor or contractual responsibility, susceptible of being sanctioned by ANDINO, in accordance with the provisions of the Internal Labor Regulations and procedures in force. Without prejudice to this, those committed by its collaborators, as indicated below, also constitute infractions punishable by ANDINO:

- a. Not subscribing to the Employee Awareness Form and/or Appendix I "Commitment to Code of Conduct Compliance", or completing it with untruthful information.
- b. Within the functions performed, not to comply or not to assume the general obligations, functions and responsibilities associated with efficient and diligent risk management to prevent ANDINO from being used to commit the crimes of ML/TF and/or risk that Directors, Managers and/or collaborators on behalf of ANDINO commit the crimes of money laundering, terrorism financing, bribery, collusion, influence peddling and other crimes defined as such in the Peruvian legal framework and where ANDINO executes operations.
- c. Not complying with the procedures that integrate the System of Prevention of ML/TF and/or with the procedures of the Prevention Model for other crimes.
- d. Failure to provide the Superintendence of Securities Market (SMV) with the necessary information to prepare the technical report with an opinion on the implementation and effectiveness of the prevention model within the framework of Law 30424 and its amendments, if required.
- e. Failure to timely communicate the Compliance Officer about certain potential unusual and/or suspicious transactions of a client.
- f. Failure to prepare the minutes, reports or records that are in their functions.

Article 13: Conflicts of Interest

Situations where personal interests and those of the company cause a conflict of interest should be avoided, such as:

- a. Doing business, contracting services, executing purchases on behalf of ANDINO with a consultant, supplier, client and/or competitor of the Company in which the Directors, Managers or collaborators, as well as their spouses or any member of their direct family and/or in-laws up to the fourth (4th) degree of consanguinity or second (2nd) degree of affinity, have a participation of any nature:

Degrees of Consanguinity/Affinity	Extent	
Degree of Consanguinity	1 st degree	Parents and siblings
	2 nd degree	Grandparents, brothers and sisters, and grandchildren
	3 rd degree	Great-grandparents, great-grandchildren, uncles and aunts, and nephews and nieces
	4 th degree	Great-uncles and great-aunts, grandnephews and grandnieces, and cousins
Degree of Affinity	1 st degree	Father-in-law and mother-in-law, son-in-law and daughter-in-law
	2 nd degree	An spouse's grandparents, brothers, sisters, or grandchildren

b. ANDINO allows professional relationships based on close ties, but to avoid conflicts of interest, sentimental relationships (spouses, partners, boyfriends, girlfriends), blood relationships (up to the 4th degree) and by affinity (up to the 2nd degree) and/or commercial relationships outside the Company should be avoided in situations where there is a subordinate relationship, or where Directors, Managers or collaborators have a function that allows the hiring, evaluation, promotion or disassociation of the other party. The same rule applies in those cases in which a process needs to be confirmed, overseen or continued, and that generates a risk of fraud (such as the placement of purchase orders, confirmation of services rendered and the making of payments), even if they come from different departments or there is no relationship of subordination.

c. When, because of your position in the Company, you or members of your direct family and/or in-laws, up to the fourth (4th) degree of consanguinity or second (2nd) degree of affinity, receive improper personal benefits from a third party related to the Company, beyond what any person could receive in similar condition.

d. Accepting personal favors such as discounts, bonuses, and additional benefits from current or potential suppliers, consultants, customers or other parties that are commercially linked to the Company.

e. Entering into agreements, commitments or business with third parties to the detriment of the Company.

f. To personally contract with third parties such as consultants, suppliers, clients, competitors, etc. or under another representation different from ANDINO and, when doing so, causing damage the Company.

g. Performing activities of a personal nature that could impact on the ability to meet their obligations to the Company, including using time paid by the Company to perform other tasks of any kind. Committing the time agreed with the Company to

fulfill functions for different purposes, including social work, charity, and others with profit or nonprofit entities.

This is not an all-encompassing list and it thus extends to any situation where personal interests and those of the Company conflict.

In the event that the collaborator is immersed in any of the situations mentioned above, he/she must declare these through the "Personal Ethics Statement" form (See APPENDIX III) upon receiving this document, updating the information each time it changes and informing his/her immediate Management. The Company must answer, within a maximum term of 30 calendar days, its consideration on each exposed situation, as well as indicate the actions that it expects to be fulfilled in order to correct the situation that generates the conflict of interest. In all cases, the Company must issue a document authorizing the situation, which necessarily requires the approval of the Board of Directors. If any of the members of the Board of Directors is involved in a possible conflict of interest, he or she must abstain from participating in its approval.

Article 14: Confidential Information

The Company considers confidential information to be all that which is not in the public domain and that is used internally to carry out the functions through the different ranks of collaborators.

It is considered a transgression if one acts contrary to the following points:

- a. All the Company's confidential information, its operations, properties shall not be disclosed to any supplier, advisor, consultant, client, competitor or any person commercially associated with ANDINO without the General Manager's written approval.
- b. The authorization to disclose information shall be of strict use for the purposes it was approved; any other use constitutes a violation of the Code of Conduct.
- c. Employee information such as position, remuneration, benefits, statements, health, and others, are personal and are used by ANDINO for strictly internal processes and constitute confidential information of restricted access, so it cannot be disclosed or used in a manner other than that permitted by law.
- d. No collaborator is authorized to give talks, seminars, nor presentations about the Company and/or its activities or about matters related to it without the General Management's authorization.

If there is any doubt about what is considered confidential, the General Manager must be consulted in writing.

Article 15: Gifts, Favors, and Bribes

ANDINO Directors, Managers and collaborators shall act according to the following policies:

- a. Any payment to facilitate processes (facilitation payments) is strictly forbidden, whether to government or private sector entities, whether local or foreign and/or

inside or outside Peru. The making of such payments is a violation of the Code and the law and may result in disciplinary action and even legal action.

b. Any offer or delivery of gifts to public officials or servants is prohibited, even if it is not intended to obtain a benefit in return.

c. Employees are prohibited from giving and/or receiving, directly or indirectly, money, items or others, in order to obtain a business, personal or other advantage that may be considered improper conduct. These are considered bribes.

d. The delivery of gifts by ANDINO to customers, suppliers and in general to companies or individuals in the private sector, is subject to the criteria of discretion and reasonableness, considering that each of the following criteria are considered without exception:

- If it is a common practice where the company/person who will receive the gift operates (for example: company anniversary, Christmas and New Year's Eve, among other national or corporate celebrations).
- If there's no intention to obtain any benefit from the person who receives the gift.
- The gifts are promotional marketing items such as calendars, simple agendas, pens, among others, with little economic value. For the purposes of this Code, gifts given to a person that do not exceed S/ 100 shall be considered insignificant. Promotional gifts of a greater amount or different from the promotional ones must be authorized by the General Management, which must document in writing (e-mail or other means) the beneficiary, reason, detail of the gift and cost thereof; likewise, the Compliance Officer must be informed.
- There is no violation of the gift rules of the company to which the gift is destined, and an authorized representative of the company must be consulted beforehand regarding such rules.

e. ANDINO does not authorize to receive, give or accept, directly or indirectly, any type of favor, gift, courtesy, cash, discount or unusual voucher, regardless of its value, impact, importance or interest, which may compromise or give the impression of commitment in the decision-making process, assessments, investigations or any other situation where there may be bias and/or affect the ability to act with integrity to defend and protect ANDINO's interests.

f. The receipt of promotional marketing items such as calendars, simple agendas, and pens will be allowed as long as their timing is usual.

g. Gifts other than the promotional ones indicated in the previous paragraph, that for commercial or other reasons of importance for ANDINO must be received, will be put in knowledge of the immediate Management to maintain transparency; this Management has the responsibility to put the gifts under custody and to report the inventory of these to the General Management with copy to the Compliance Officer. The General Management shall determine the manner in which such gifts shall be

disposed of, communicating it to the employees in a timely manner. Gifts such as sports practices, trainings, air tickets, travel expenses, tickets for concerts or events; vouchers for dinners, lunches, and baskets with diverse products, liquors, or others, as well as any circumstance that may be considered to influence the integrity of the Director, Manager or collaborator. This applies both in cases where the delivery is made in the offices and when it is made at the home of the Director, Manager or collaborator or directly to him.

If there is any doubt about the appropriateness of a gift or favor, a written inquiry should be made to the immediate superior officer with a copy to the immediate superior manager, if any, and the Compliance Officer.

Article 16: Political Contributions

Under no circumstances does ANDINO make contributions to political parties or candidates for public office. Likewise, ANDINO's resources and image cannot be used for political nor partisan interests.

Article 17: Donations

ANDINO will not make donations to public entities. However, exceptionally, the General Management and Board of Directors may approve charitable donations or sponsorships in the name of ANDINO, only for good faith charitable purposes (for example, for a charity or other non-profit organization, in cases of emergency, natural disasters or others of similar nature) and that are legal and ethical under local laws and practices, provided that ANDINO does not receive nor expect to receive any tangible benefit. In the event that the General Management and Board of Directors approve a donation, the following should be considered:

- a. The responsible management should consult the legal and formal procedures to be followed to avoid any legal contingency. In case ANDINO does not have a specialized lawyer, it will have to resort to external legal consultants. A formal legal report should be obtained indicating the steps to be followed for the donation.
- b. The legal report indicated above must be approved by the Compliance Officer, the General Management, and the Board of Directors, and the Board of Directors will make the final decision on whether or not to make the donation.
- c. The responsible management will report the donation made to the Compliance Officer with a copy to the General Management and the Board of Directors.
- d. Management responsible for managing the donation shall ensure that all records, including accounting records, of such donation are actually made and are reasonably detailed in order to identify the donated good and its purpose.

Article 18: Use of the Company's Assets

a. ANDINO puts at your disposal goods (for example: computers, cell phones, furniture, offices, security equipment, among others) that allow you to carry out your work. The correct use and care of such goods is under the responsibility of the person to whom these were assigned, whether Director, Manager or collaborator. Likewise, such persons must ensure that they are used solely and exclusively for the purposes for which they have been assigned and in no case for their own

benefit or that of an unauthorized third party, unless there is express written authorization to do so from the immediate superior management.

b. The care and protection of the Company's property is mandatory and any action against it is considered a breach of this Code subject to penalty depending on the degree of intentionality and/or negligence that allowed the improper use, loss or damage to property.

Article 19: Actions of Fraud

a. ANDINO does not accept any type of fraud action committed by collaborators, regardless of their rank, position or level; whether consultants, suppliers or any person and/or company that has an employment, commercial and/or any other type of relationship. Fraud actions carry internal sanctions that may lead to a collaborator's dismissal, which may also entail legal actions.

b. It is forbidden to manipulate personal information or to cheat in order to benefit from additional vacation time, to obtain medical breaks with false documents, to fail to complete the full working day, to report unpaid overtime, among other unethical and untruthful actions. Doing so can lead to sanctions, up to and including dismissal.

c. Failure to report overpayments both received and made for the benefit of others, taking advantage of miscalculations, or reporting travel or other expenses using false or altered documents is a violation of the Code of Conduct.

d. Contracts for the purchase and sale of goods and/or services must be made based on evaluations of quality, efficiency and price, always projecting the greatest and best benefit for ANDINO. Obtaining personal benefit of any kind constitutes an act of fraud.

e. The use of petty cash money for personal use, even if it is later replaced, constitutes fraud.

f. Any action intended to avoid legal action and/or compliance, no matter the reason, is a fraudulent act that ANDINO does not authorize, permit nor accept.

g. Fraud is also any Accounting and/or Internal Audit practice that implies:

- Falsifying or modifying data for personal benefit or for third parties.
- Inaction before situations of fraud or unethical behavior, including not taking preventive actions in situations of fraudulent risk.

h. The participation in actions related to the smuggling of goods or drug-trafficking constitutes fraud and a crime and is subject to dismissal as well as the corresponding legal actions.

i. The list contained in this section should not be considered exhaustive, thus being applicable the corresponding legal norms.

j. ANDINO considers as a violation of the Code of Conduct both the actions committed directly, as well as the complicity in not making a report upon knowledge of a violation of this Code. The Corporate Internal Auditor is responsible for keeping under his control the report of any situation of fraud in ANDINO and to report it to

the Audit, Ethics, Corporate Governance and Compliance Committee in case he considers that the seriousness of the fault merits it; if so, such communication shall be made with a copy to the Compliance Officer for his information and contribution throughout the investigation process.

Article 20: Protection of ANDINO's image and reputation

The Directors, Managers, collaborators, and those who act on behalf of ANDINO, will not act in a way that could compromise the reputation of the Company. In this sense, it is forbidden:

- a. Declare to the media information that have not been previously approved by the Board of Directors and legal advisor. In case the statement includes any matter under the competence of the Compliance Officer, the General Manager shall consult with him or her and submit the statement for the approval of the Board of Directors.
- b. Participate in political events on behalf of ANDINO.
- c. Use signs, identity symbols and the name of ANDINO in a manner not authorized by the General Manager or for personal purposes.

Article 21: Social Media

Participation in social networks and Internet sites cannot put at risk the principles that ANDINO promotes. It is forbidden to publish in social media inappropriate photographs or videos exposing ANDINO, its Directors, Managers, collaborators and related parties. Those who expressly show their work relation with ANDINO in their profiles should refrain from taking sides on issues that could hamper ANDINO's reputation.

It is forbidden to share confidential information or comment on corporate matters in private or public networks as well as to create groups/pages in social media or Internet sites that contain the name and/or logo of ANDINO. The disclosure of ANDINO's information in social networks is exclusive responsibility of the person the Board of Directors designates as responsible for image and corporate relations.

Article 22: Management of Interests and Meetings with Public Officials

Any act of management of interests carried out by any Director, Manager or collaborator in representation of ANDINO shall be carried out in a transparent manner and in compliance with Peruvian regulations or those of the country where ANDINO operates. The management of interests will not be used by any representative of ANDINO as an excuse to cover up acts of corruption.

Any meeting with public officials (from a Peruvian government entity or from another country) for the purpose of managing interests on behalf of ANDINO must have the prior approval of the Board of Directors and the legal counsel and, also, be communicated to the Compliance Officer. The Board of Directors will authorize the persons who will attend such meeting on behalf of ANDINO. The following must be considered for such meeting:

- a. Request the meeting in a formal manner following the applicable procedure established by the corresponding public entity, if any. If there is no such procedure,

the meeting must be coordinated in writing on ANDINO letterhead with the charge of receipt at the table of parts of the entity or proof of electronic receipt.

b. It is prohibited to hold the meetings in places other than in the public entity's offices.

c. At least two (2) ANDINO representatives must attend and keep a record of meetings with public officials containing the following information:

- Date and time of the meeting
- Meeting place
- Meeting Objective
- Attendees
- Topics covered

This record must be sent by e-mail to the Directors and immediate superior in case there is a level of subordination, with a copy to the Compliance Officer and General Manager, if applicable.

d. In the case of coordination, processing or any other activity that is part of the daily exercise with public servants or officials (e.g. SUNAT, DIRANDRO, or others), it shall not be necessary to keep the record of meetings with public officials; however, meetings may only be held within the public entity's offices.

e. Notwithstanding the foregoing, in case any ANDINO Director, Manager, and/or collaborator has a relationship of kinship or affinity with any officer or public servant, he may meet with such officer without observing the provisions of this section, provided that no issues related to ANDINO are discussed and that the Director, Manager and/or collaborator has included such officer or public servant in his Personal Ethics Statement, as indicated in this Code's Article 13 regarding Conflicts of Interest.

f. The Compliance Officer shall have free access to all communications with public officials that relate to ANDINO's activities. This officer may request a copy of any e-mail, telephone message, Whatsapp message or communications by other means, without compromising privacy.

Article 23: Use of Privileged and Undisclosed Information

Information is "privileged" when there is a strong probability that a sensible investor may consider such information important for making an investment decision. Information is "undisclosed" when it has not been communicated to the general public.

It is strictly forbidden that any ANDINO Director, Manager, collaborator and/or representative use privileged and undisclosed information for:

a. Directly or indirectly, acquire, sell or otherwise trade the securities of ANDINO or any company that has business relations with ANDINO while it is in possession of relevant and undisclosed information (not public).

b. Disclose to third parties, directly or indirectly, relevant information of non-public character to which they have access due to the execution of their functions for ANDINO, and that involves ANDINO or another public company.

The collaborator who has privileged and undisclosed information in his hands must not exchange it nor recommend the purchase or sale of the involved securities and must not use it for his own benefit, until the information has been communicated to the general public.

Beyond disciplinary action or termination of employment, as appropriate, and within the applicable regulatory framework, violation of this policy may result in future legal action against the ANDINO Director, Manager, employee and/or representative involved.

Article 24: Harassment, Harassment, Discrimination and Other Types of Violence

Andino promotes adequate working conditions in line with current labor legislation. In this sense, manifestations of violence in any of its manifestations will not be tolerated, such as: all forms of harassment and/or sexual harassment and all types of violence, such as physical, psychological, moral or any other type, as well as abuse of authority at work or other conduct that generates an intimidating or offensive environment for the personal rights of our collaborators, Directors or Managers. Likewise, in Andino, no discriminatory treatment is allowed due to gender, race, color, nationality, social or economic condition, ethnic origin, age, marital status, sexual orientation, ideology, political opinions, religion or any other personal condition susceptible of being a source of physical or social discrimination of our Directors, Managers and/or collaborators.

Article 25: Disciplinary measures

Directors, managers or collaborators who incur in the conducts indicated in the previous articles found in this Chapter (V) shall undergo corrective measures, which will have to be qualified, according to their severity, as light, serious or very serious, so that ANDINO imposes the corresponding sanction, according to:

a. The disciplinary measures applicable to Directors and the General Manager for the noncompliance with this code's provisions shall be determined and executed by the General Shareholders Meeting, and the Compliance Officer shall be informed for its registration and control.

b. In the case of line managers and collaborators, the Compliance Officer and the General Manager, in coordination with the Immediate Superior, must qualify the infractions according to their severity and apply the disciplinary measures in accordance with Internal Work Regulations and its provisions. If considered necessary, the General Manager, in coordination with the Compliance Officer, will submit such decision to the Audit, Ethics and Corporate Governance Committee.

The corrective measures imposed on ANDINO Directors, Managers or collaborators must be registered in personnel files.

The company's application of disciplinary measures does not exempt the Director, Manager, collaborator, client, supplier or counterpart from judicial problems if these were to emerge as a result of this Code of Conduct's breach.

The company will take the corresponding legal actions in case of violation or breach of the Code of Conduct or related or supplementary rules, whomever is Director, Manager, collaborator, client, supplier or counterpart.

Chapter VI: On Money Laundering Crimes and Funding Terrorist Networks and Corruption

Article 26: Money Laundering Crimes

Money laundering crimes typified in Legislative Decree 1106 on the Effective Fight against Money Laundering and Other Crimes, are the following:

- a. Acts of conversion and transfer: When money, goods, effects or profits whose illicit origin is known or must be presumed are converted or transferred, in order to avoid the identification of their origin, their seizure or confiscation.
- b. Acts of concealment and possession: When money, goods, effects or earnings whose illicit origin is known or should be presumed, are acquired, used, kept, administered, guarded, received, concealed or kept in their possession, with the purpose of avoiding the identification of their origin, their seizure or confiscation.
- c. Transport, transfer, entry or exit through the national territory of money or securities of illicit origin: When money or securities whose illicit origin is known or should be presumed, are transported or moved within the national territory with the purpose of avoiding the identification of their origin, their seizure or confiscation, or makes such goods enter or leave the country with the same purpose.
- d. Refusal, delay and falsehood in the supply of information: When he or she refuses or delays to provide the competent authority with the economic, financial, accounting, commercial or business information required in the context of an investigation or prosecution for money laundering crimes, or deliberately provides inaccurate or false information.

Article 27: Terrorism Financing Crime

The crime of financing terrorism typified in Law 29936, is the following:

"Whoever by any means, directly or indirectly, within or outside the national territory, voluntarily provides, contributes or collects funds, financial or economic resources or financial services or related services with the purpose of committing any of the crimes provided for in Decree-Law 25745, any of the terrorist acts defined in treaties to which Peru is a party or the realization of the purposes of a terrorist group or individual terrorists, shall be punished with imprisonment of not less than twenty and nor more than twenty-five years".

The penalties for the crimes described above in Articles 23 and 24 are set forth in the Criminal Code (Legislative Decree 635). ANDINO will apply the corresponding sanctions based on the Internal Work Regulations to the collaborators who, according to their acts or omissions in the exercise of their functions, are linked to the aforementioned crimes.

Chapter VII: Reporting Channels

Article 28: Reporting Unethical Actions and/or Non-compliance with the Code of Conduct

The Company has accessible channels of denunciation (Ethical Line) so that the Directors, Managers, collaborators, clients, suppliers, counterparts and/or any group of interest can report infractions against the ANDINO Code of Conduct. Such reporting means will guarantee anonymity and confidentiality, if desired by the denouncer. ANDINO guarantees absolute observance to those who report actions against this Code, prohibiting any harassment, discrimination or any action that harms the complainant.

Any unethical conduct that violates this Code must be reported:

- **What should we report?**

Answer: Any situation that generates suspicion about inappropriate conduct and that violates the ANDINO Code of Conduct.

- **Who should report?**

Answer: Any person who identifies activities that they believe are in violation of the ANDINO Code of Conduct has the right to report them.

- **Do we have to report our identity?**

Answer: It is not necessary; however, doing so ensures that your identity is kept confidential and would help reduce the review time for taking appropriate action to resolve the reported situation.

- **What channels are available for reporting a report?**

Answer:

Toll free number **0800 00626** and landline (511) 622-3103

Voice mail (available 24 hours a day year-round)

Web platform: bdolineaetica.com/canaldedenunciasandino

Email address: lineaetica@bdo.com.pe

Virtual reception of complaints by appointment during office hours

Chapter VIII: Final Provisions

First - ANDINO collaborators will subscribe to the acceptance of this Code and will commit to its fulfillment in the terms of Appendix I.

Second - The articles of this Code of Conduct are not restrictive, and new provisions may be incorporated if they are in accordance with the values and principles referred to in the Code of Conduct.

Third - The Compliance Officer shall be in charge of informing ANDINO collaborators about this Code of Conduct and overseeing its strict compliance. To

this end, each of them will be given a copy, and will seek the subscription of the respective compliance commitment, according to Appendix I.

Appendix I: COMMITMENT TO CODE OF CONDUCT COMPLIANCE

I hereby declare that I have received and read the CODE OF CONDUCT, which aims to establish in a generic way the principles, responsibilities and rules of conduct that guarantee that the Directors, Managers and Collaborators of Andino Investment Holding S.A.A. (ANDINO), develop their professional and personal activities within the ethical and moral principles, and the current norms; ensuring that the company's activity is surrounded by respect, loyalty, honesty, equity and confidentiality in all activities, providing the necessary security and transparency that prevents:

- a. The use of ANDINO as an instrument to commit any crime, including money laundering and terrorism financing.
- b. That Directors, Managers, collaborators and any other person acting on behalf of ANDINO commit the crimes of money laundering, terrorism financing, bribery, collusion, influence peddling and/or other crimes typified by the Law in Peru and/or where ANDINO operates.

Lima, ____ of _____, 20____

Signature

Name and surname

DNI number

Appendix II: COMMITMENT TO CONFIDENTIALITY AND DISCRETION

I, _____, identified with DNI number _____, by means of this document, expressly assume the obligation to keep absolute confidentiality and reserve on all information and/or documentation belonging to Andino Investment Holding S.A.A. (ANDINO), that I know of and/or that has been obtained by physical or electronic means, on the occasion of the activities and work that I have been carrying out within the company.

Therefore, I assume the unwavering obligation not to disclose, disseminate, deliver or reproduce information and/or documentation to third parties outside ANDINO, declaring that such information will maintain reserved, confidential and privileged from the moment I became aware of it, under any form.

The confidentiality commitment extends for an indefinite term even if my work relation with ANDINO is suspended or concluded, regardless of the reason or cause that originated the conclusion of this relation. Likewise, I declare to understand the full extent of this commitment, as well as the duties and responsibilities that are derived it, and that if I breach my commitment of confidentiality and reserve, ANDINO will have the right to exercise the civil and penal actions that, in safeguard of its interests, will be able to make use of before the corresponding administrative and judicial instances in order to obtain the compensations and the economic reparations for the damages caused.

I pledge my Commitment to Confidentiality and Discretion in the city of Lima on _____ (month) _____ (date), 20____.

Signature

Name and surname

DNI number

Appendix III: **PERSONAL ETHICS STATEMENT**

Complying with the Code of Conduct of Andino Investment Holding S.A.A. (ANDINO), I declare under oath the following facts corresponding to the year:

1. I have received from suppliers, clients, consultants and/or from a third party commercially linked to ANDINO, discounts, favors, payments, vouchers, invitations and/or any type of benefit other than promotional objects distributed in general to more than one person in the Company.

YES ___ / NO ___

2. I have relatives with up to fourth (4th) degree of consanguinity (*) or second (2nd) degree of affinity (*) who work in ANDINO or for its affiliate companies, clients, consultants, etc.

YES ___ / NO ___

3. I have done business with ANDINO companies, suppliers, clients, consulting firms, etc., where relatives with up to fourth (4th) degree of consanguinity (*) or second (2nd) degree of affinity (*) work.

YES ___ / NO ___

4. Without prejudice to my work relationship with ANDINO, I have positions or work commitments with other entities with or without profit purposes, such as Director, Partner, Manager, Collaborator, Advisor, etc.

YES ___ / NO ___

5. I declare to know that to carry out any transaction with ANDINO that could benefit me or any member of my family up to fourth (4th) degree of consanguinity (*) or second (2nd) degree of affinity (*), I require authorization from the General Management and the Board of Directors.

YES ___ / NO ___

(*) Up to 4th degree of consanguinity: Spouse/partner, parents, children, grandparents, siblings, grandchildren, great-grandchildren, uncles, grandparents, nephews, great-uncles, nieces, nephews, grandchildren and cousins. Up to 2nd degree of affinity (family on the part of the spouse/partner): father-in-law, children, grandparents, siblings and grandchildren.

You shall have to give the details referring to relatives, companies, positions, etc., as appropriate:

I also declare that I have read and understood the content of the ANDINO Code of Conduct and I point out that to date I have declared any fact, situation or circumstance related to a possible conflict with the Code of Conduct rules. Likewise, I understand that any of the following situations constitute misconduct and that these could derive in disciplinary actions against me by ANDINO:

1. Having failed to communicate a possible conflict of interest, or having done so inaccurately or partially.
2. Maintaining an activity or action that constitutes a conflict of interest and whose authorization has been denied by the Compliance Officer, the General Management and/or the Board of Directors, or failing to take action to eliminate such conflict.

In the case of conflicts with the Code of Conduct that could be considered unacceptable under any circumstances under the rules of that Code, I declare my express agreement to the decision made by ANDINO always within the scope granted by law.

I also declare my commitment to make ANDINO aware of any fact that could generate an ethical conflict against the Code of Conduct within 10 days of my knowledge of the situation or action, modifying this declaration if necessary.

Full name and DNI number:

In _____, _____ (month) _____ (date), 20____.

Signature