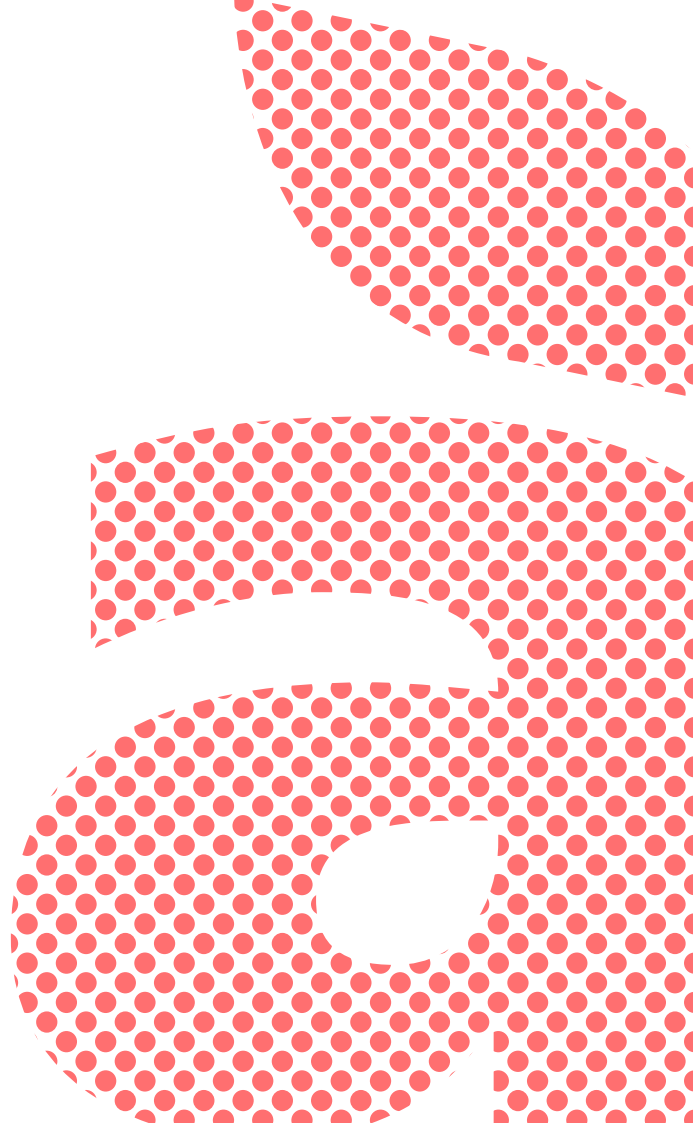


# GUIDE TO ETHICAL COMMITMENTS

GCE VERSION 005 - JULY 2021



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# 1 AN IMPLEMENTATION GUIDE



# TEAM,

In our Company\* we respect. We are upright and honest, and we always do the right thing.

We know that in our day-to-day activities, we make many decisions, and that some definitions are more complex than others. So, it is important that we always keep in mind our Ethical Commitments, guidelines and policies to be better prepared to know how to act and deciding criteria to apply.

Our Ethical Commitments reflect how we are to act with integrity in line with our corporate values, in all situations that we may face in our day-to-day work. I what am counting on all of you to review this document and be representatives of our culture at all times always counting on all of you to review

| Alfredo Pérez Gubbins  
CEO

\*The Guide to Ethical Commitment is mandatory and applies to employees, including financial executives, and members of the Board of Alicorp SAA and its subsidiaries.



# OUR CULTURE

## OUR PURPOSE

We Nurture a  
Better Tomorrow.

## MISSION

We transform markets  
through our leading  
brands, generating  
extraordinary  
experiences for our  
consumers. We  
constantly seek to  
innovate, to generate  
value and well-being in  
society.

## VISION

To be leaders in the  
markets in which  
we compete.

# OUR VALUES



## WE LEAD WITH PASSION

We are passionate leaders in everything we do. We are entrepreneurs, with a winning spirit and courage, which motivates us to innovate and transform markets.



## WE ARE CONNECTED

We feel the objectives of the organization as our own and we fulfill them with excellence. We work connected to generate value and well-being.



## WE ARE AGILE AND FLEXIBLE

We are an agile and flexible team, we know how to take risks, we learn from our mistakes and we upright celebrate our successes.



## WE RESPECT

We are ethical and honest. We respect our people, customers, consumers, the environment and the community in which we live. We welcome different points of view.



## WE TRUST

We live in an environment in which people feel safe to express what they think. We genuinely trust our people and their talent.

# WHAT ARE ETHICS ?

When we talk about Ethics, we are referring to the guidelines that allow us to live our corporate values. We also refer to the commitments that each person assumes in their relationship with shareholders, board members, employees, customers, consumers, suppliers, competitors, as well as with the state, society, the environment, the media and associations.



# HOW TO LIVE OUR ETHICAL COMMITMENTS?

To live Ethical Commitments, we must maintain behavior ou, acting according to our values and following the guidelines established in this Guide a complete and honest activities. For the Company, there is no purpose that justifies behaving outside the Ethical Commitments outlined here, so our position on corruption and bribery is that of zero tolerance.

To achieve this—and to ensure compliance with the Company guidelines and policies—we have the Corporate Ethics Committee, which reports to the Audit Committee made up of members of the Board of Directors. Below, we present our Ethical Commitments and some guidelines for greater clarity. We invite you to familiarize yourself with them and fully live them daily.

| Paola Ruchman  
| President of the Corporate Ethics Committee

# THREE QUESTIONS TO BE CLEAR

## WHAT DO WE EXPECT FROM OUR PEOPLE?

The commitment to contribute to the strengthening of our culture, which brings us closer to living our purpose daily, whilst always thinking of acting with integrity and in line with our values.

All the people who make up the Company are the main promoters and defenders of our Ethical Commitments, making decisions and acting according to what is defined in this Guide and in our policies. This will allow us to prevent risks and build relationships, based on respect and trust, with our different stakeholders, projecting integrity and safeguarding the Company's reputation.

## HOW DO I KNOW IF I AM BEHAVING IN LINE WITH OUR ETHICAL COMMITMENTS?

Before acting or making any decision we must ask ourselves:

- Is my decision in accordance with our corporate values?
- Is my decision in line with our Ethical Commitments?
- Is what I am doing, or witnessing allowed or legal?
- Could it harm my reputation or that of the Company?

## WHAT SHOULD I DO IF I KNOW OF ANY BREACH OR IRREGULARITY TO OUR GUIDE TO ETHICAL COMMITMENTS?

We promote an environment of honesty and transparency.

Therefore, in , an irregular situation case, we must communicate it using any of learning of three channels:

- **Communicating y to the immediate supervisor or superior:** Report the conflict situation to your supervisor or direct superior, area manager or director.
- **Communicating these to Human Resources:** You can report the case to the Human Resources leader of your choice; for example, to your Manager or to your Human Resources Business Partner.
- **Communicating through the Alicorp Ethics Hotline:** this channel is operated by an independent firm.

# OUR ETHICAL COMMITMENTS

## WITH OUR PEOPLE

We are committed to creating a work environment where respect and trust are the basis of relationships between all our employees, who are the main of development engine for the Company. Additionally, we are committed to providing you with a safe and healthy workplace.

*Read more Page 12*

## WITH THE COMPANY AND ITS SHAREHOLDERS

Our commitment to shareholders is always to act while preserving the value of the Company.

*Read more Page 15*

## WITH CUSTOMERS AND CONSUMERS, SUPPLIERS AND COMPETITORS

We are committed to ensuring that our relationships with customers, consumers, suppliers and competitors are based on respect, transparency and long-term

*Read more Page 25*

# OUR ETHICAL COMMITMENTS

## WITH THE STATE, SOCIETY AND THE ENVIRONMENT

We are committed to interacting with public entities and officials, adhering to the highest standards of Ethics, and thus strictly prohibited from committing acts of corruption. Likewise, it is our commitment to respect the environment in which we carry out our activities, complying with the laws of the locations where we operate.

*Read more Page 28*

## WITH THE MEDIA AND ASSOCIATIONS

We are committed to sharing pertinent information regarding the Company and its operations with our stakeholders in a timely and truthful way. As such, we have, to achieve this, we use authorized channels and representatives.

*Read more Page 33*

# TO LEARN MORE ABOUT OUR POLICY AND ETHICAL COMMITMENT GUIDE, SCAN THE FOLLOWING QR CODES:

**VIRTUAL REPOSITORY:  
GUIDE TO ETHICAL COMMITMENTS  
AND POLICIES**



**VIDEO:  
OUR ETHICAL COMMITMENTS**



# 2 WITH OUR PEOPLE



**WE ARE COMMITTED TO CREATING A WORK ENVIRONMENT WHERE RESPECT AND TRUST ARE THE BASIS OF RELATIONSHIPS BETWEEN ALL OF OUR EMPLOYEES, WHO ARE THE MAIN ENGINE OF DEVELOPMENT FOR THE COMPANY. ADDITIONALLY, WE ARE COMMITTED TO PROVIDING YOU WITH A SAFE AND HEALTHY WORKPLACE.**

## 2.1 EQUALITY OF OPPORTUNITY AND RESPECT

**We offer employees an environment of respect, trust and equality for all, where they can find opportunities to develop both personally and professionally.**

- We promote growth, continuous learning and professional development for the people who comprise our Company.
- We will promote meritocracy: the equality of opportunities based on a fair and objective evaluation, per their level of contribution and the achievement of their objectives.
- We value the integrity of people and we respect our work environments, our peers and our work team, that is why we always expect dignified, respectful and courteous behavior.
- We are an inclusive workplace, free from discrimination, harassment\* of any kind, intimidation or offense.
- We listen to and value the opinions, beliefs and ideologies of the people with whom we interact, always promoting an environment of respect and tolerance.

## 2.2 A SAFE AND HEALTHY WORKPLACET

**We promote a culture of prevention in all our employees in order to protect their physical integrity and offer them a safe and healthy work environment.**

- We provide a work environment where we ensure the physical integrity of the people who comprise our Company.
- We ensure that the work environment is free from physical or psychological abuse.
- We are aware of the need to respect and enforce legal requirements, as well as the Company's provisions and safety policy. We thus must report any situation that puts the people who make up the Company, the work environment or the communities where we operate at risk. We demand the same diligence for our visitors, suppliers, clients and anyone who carries out activities throughout our facilities.
- We seek the well-being of the people who make up our Company. Consequently, we do not tolerate employees carrying out their functions under the influence of drugs and alcohol, as they could put their integrity and that of their work team at risk.

\*You can find more information in our Corporate Sexual Harassment Prevention Policy.

# WITH THE COMPANY AND ITS SHAREHOLDERS



**OUR COMMITMENT TO SHAREHOLDERS  
IS ALWAYS TO ACT WHILE  
PRESERVING THE VALUE OF THE  
COMPANY.**

### 3.1 RESPONSIBLE USE OF THE AUTHORITY GARANTED

**We protect the trust that the Company places in each and every one of us, acting with the highest standards of truthfulness and Ethics when we carry out our daily task.**

- We preserve the trust that the shareholders and our work team place in the manner in which we conduct business and we are committed to act, at all times and in any aspect of our work, with the highest standards of truthfulness and Ethics.
- We are responsible for relationships with our shareholders and investors. As such, we must provide them with fair treatment, in line with the principles of good corporate governance.
- We guarantee the security of our shareholders' information; these records are the Company's responsibility.

### 3.2 CONFLICTS OF INTEREST

**We act honestly and ethically, avoiding situations that represent or could represent a conflict between personal interests and those of the Company. For example:**

- Make decisions or carry out transactions with clients, suppliers, competitors with the intention of generating some personal gain, either direct or indirect, instead of doing what is best for the Company.
- Carry out, as long as we are employees, investments that give us the power of management in supplier companies, clients, competitors or with which we have a relationship, except when there is specific approval from the General

Management.

- Use the Company's assets, as well as confidential, privileged and strategic information Company for personal gain.
- Carry out other activities that interfere or conflict directly or indirectly with our activities or functions in the Company.
- When the Company hires relatives up to the third degree of consanguinity and second of affinity of employees or members of the Board of Directors\*.
- Manage or have a decision-making position in business relationships with clients or contracting suppliers, with whom direct employee family members (spouse or partner, children, siblings and parents) work.
- Influence third parties or be influenced by third parties to the detriment of the interests of the Company, putting personal or family interests first.
- It also qualifies as a conflict of interest when obtaining gain or advantage because of one's relationship (family or friendship) with a public official, to achieve a result even when it seems that it would not affect the Company.

\*This guideline only applies to Alicorp SAA and subsidiary operations in Peru. In other operations, employees must inform the Human Resources area if their relatives, related to a third degree of consanguinity, work within the Company. A such, it is possible to identify and prevent situations of conflicts of interest. Any exception to this guideline must be approved by the General Management of Alicorp SAA.

- We act with transparency and Ethics, reporting any situation of conflict of interest, current or potential, to our immediate superior or through the channels outlined by **the Company, as indicated in the Corporate Conflicts of Interest Policy.**
- Senior management members\* may only receive loans from the company or other companies in the economic group with the prior authorization of the Board, except in the case of financial institutions.



## RECOMENDATION

**Any potential conflict of interest situation should be communicated to your direct superior and declared in the Conflict of Interest Declaration Form that is part of the policy. For example:**

- If our family members work in client companies, suppliers or competitors of the Company, we disclose it.
- We also disclose our personal relationships that may generate conflicts of interest, such as couple relationships or family relationships.
- We report any connections with public officials.

\*Includes CEO and Vice Presidents.

## EXAMPLE

### **If I have my own business, am I acting against our Guide to Ethical Commitments?**

Employees can dedicate their free time to the activities they choose, including those that represent a source of income such as consultants, administrators of their own business, among others. Employees are not allowed to engage in activities that:

- Interfere with the performance of our tasks and functions and / or that are carried out during work hours.
- Are carried out using the Company's resources and / or within its facilities.
- Affect and / or could affect the Company's interests. For example, being consultants to Company suppliers or clients.

### **What should I consider if I want to be a professor at a university or institute?**

We recognize that teaching is an important activity that contributes to generating and sharing knowledge for the Company and for the community.

Therefore, employees who are engaged in this activity and share Company information must inform their immediate superior to verify that it is public information. For more information, contact a Human Resources representative.

**TO LEARN MORE ABOUT  
WHAT A CONFLICT OF  
INTEREST IS, SCAN THE  
FOLLOWING QR CODE:**



### 3.3 DELIVERY OR ACCEPTANCE OF GIFTS AND HOSPITALITY

**We trust the good judgment of our employees in situations in which the delivery or acceptance of a gift may generate a Conflict of Interest with the Company.**

- Gifts and hospitality (entertainment, travel or any other benefit) may give the impression of having been given or received in order to persuade or unduly influence the decisions of the recipient; therefore, gifts should not be accepted or granted if they can be perceived as a form of inappropriate influence in a relationship or business decision.
- Gifts of modest or symbolic value are allowed. However, receipt of ostentatious gifts that may give the appearance of influencing decision-making, as stated in our **Corporate Gifts and Entertainment Policy**, are prohibited.
- Gifts to public officials are not allowed. These may include certain symbolic hospitality, as a gesture of consideration and respect, by exception and with legal authorization\*. Employees must inform the Company's Legal and Compliance Area, as indicated in the **Corporate Policy of Gifts and Hospitality**.

\*Likewise, employees are required to inform the Vice President or Country Manager, as appropriate.

## EXAMPLE

### What gifts can we receive?

Gifts and hospitality must be received and given at an appropriate time and circumstance, thus they cannot be accepted during negotiation processes and / or when they may compromise decision-making.

Receiving modest or symbolic gifts that do not exceed the reference value of 10 US dollars is allowed, for example: logo pens, a small basket of products, trophies, notebooks, agendas, etc. Receipt of ostentatious gifts that can give the appearance of influencing our decisions, such as: airfare, cash, liquor, etc., are prohibited.

### What should I do if I am offered a gift that I should not receive?

Politely reject the offer, explaining that the Company has a Corporate Gift and Hospitality Policy. If you are sent a gift and the rejection of it could offend or affect the relationship with the person who gifts it, you may accept the gift as an exception and raffle it off within your team. You must have the approval of your superior and inform Human Resources. In addition, in the future, you may want to communicate our Policy in advance, in order to avoid receiving gifts that are outside of this Policy.



### 3.4 RESPONSIBLE USE OF THE COMPANY'S ASSETS AND INFORMATION

**We are responsible for the proper use and care of work equipment, and we always protect the Company's information with professionalism and confidentiality.**

#### PROPER USE OF ASSETS

- We use the assets that the Company provides us to carry out our functions and responsibilities for the benefit of the Company and not for personal or third-party purposes. We understand that these assets are the Company's property and that they are referred to as tangible (physical) and intangible assets (information, business plans, patents, among others).
- We are responsible for the proper use, care and protection of assets, especially those that are assigned to us or are within our control, including technological resources, as well as physical and electronic information.
- We use technology resources responsibly and consistently with this Guide to Ethical Commitments and with all other Company policies and guidelines, including the **Corporate Information Security and Cybersecurity Policy**. Technology resources include all the computer equipment that the Company owns, rents or leases, regardless of their physical location, for example: desktop computers, portable computer equipment, network servers, internet access, intranet and access devices to email, voicemail, fax equipment, telephones, among others.
- We refrain from uploading, downloading, sending, viewing or accessing electronic information that is questionable or that could cause discomfort, inconvenience, offense, that may be

morally unacceptable or that may irritate our co-workers. We also do not use material that is illegal or that could expose the Company to legal responsibilities for the use of unauthorized intellectual property.



## RECOMENDATION

**In our day-to-day work we use Company resources to develop our functions. It is our responsibility to take care of these resources and manage them responsibly. For example:**

- If the Company requests a market study from a specific consultancy, it must not be shared with outsiders.
- We care for the infrastructure, non-fixed assets and equipment that the Company makes available to us, such as changing rooms, desks, computers, among others.
- We must always endure the use of a secure connection and refrain from keeping confidential information in our personal electronic items.

## PROTECTION AND PRESERVATION OF INFORMATION AND RECORDS

- We protect Company information against loss, manipulation, theft, misuse, transfer (even if without malicious intent), violation or undue disclosure, and we treat information of our clients, suppliers and those of whom are part of the Company with the same care.
- We co-operate with the auditing, supervision, and control processes that the Company carries out as part of its permanent management.
- We treat Company information as a valuable asset; therefore, acting in accordance with the **Corporate Information Security and Cybersecurity Policy** and implementing actions such as:
  1. Transfer of all the information when changing functions or areas, and appropriately delivering it. We are concerned not only with appropriately delivering the information, but also with sharing the knowledge and experience gained in the position we hold.
  2. Discard information that is no longer necessary.
  3. Classify the corresponding information as confidential, sensitive, or non-public.
  4. Back up and protect information against unauthorized access or interference.
  5. Responsible custody of physical files and electronic files.
- Being a public entity, the Company's stock values are sensitive to the undue dissemination and use of privileged information. Consequently, we protect and do not disseminate privileged or confidential information between

friends or family, nor internally with non-authorized personnel as unduly used information could affect the value, brand and stock of the Company.

- As members of our companies and as users of privileged, confidential, or non-public information, we must refrain from buying and selling, directly or indirectly, company shares. Those with privileged information may trade shares in the company once the information is made public.
- We act with transparency and Ethics, reporting any current or potential conflict of interest situation, as indicated in the **Corporate Conflict of Interest Policy**.
- We understand that, according to current regulations, it is illegal to trade stock using privileged and confidential information. This includes non-public information that could be used by an investor to buy or sell shares of our Company, such as:
  1. Performance forecasts (profit or loss).
  2. Restructuring.
  3. New acquisitions or investment withdrawal.
  4. Launch or relaunch of product projects.
  5. Customer and supplier listings, pricing structures and policies.
  6. Financial matters, among others.

## PRESERVATION OF INTELLECTUAL PROPERTY

**We respect the intellectual and industrial property rights of our Company and stakeholders.**

- We safeguard the information or material protected by property rights and protect the intellectual capital of our Company, clients, suppliers and third parties. Therefore, we ensure the proper use and protection of the Company's intellectual and industrial property, such as trade secrets, trademarks, identity signs and symbols, patents, and knowledge.
- We recognize that inventions, improvements, innovations, and developments generated as members of our Company in direct relation to our functions and responsibilities, are the property of the Company.
- We respect the intellectual and industrial property rights of other companies, thus we do not improperly use patented or registered documents or materials, nor do we disclose or use confidential information of the companies in which we have previously worked.

## COMPLETENESS OF FINANCIAL REPORTS AND OTHER REPORTS

- We comply with the corresponding legal provisions with the **Generally Accepted Local Accounting Principles and International Financial Reporting Standards**, and with the control guidelines issued by our companies, in order to provide adequate information for our different stakeholders.

- We present financial, social, environmental, or other reports in a timely manner, which fully, transparently, and truthfully reflect the situation of our Company, in order to preserve the trust of shareholders and our stakeholders.

## 3.5 BUSINESS TRIPS

**We are responsible and honest with the expenses we incur on work trips.**

- We are committed to the correct estimations, authorizations, use and approval of the budget and the facilities assigned by our Company for work trips or training, based on compliance with the policies and the actual needs of the business.
- We are responsible and honest with the expenses we incur on work trips.
- We report travel expenses accurately, completely, reliably and within the corresponding period of time, strictly following the provisions of the **Company's Corporate Travel Policy**.

## 3.6 FRAUD PREVENTION AND ABUSE OF POSITION

**In our Company we do not tolerate any act of fraud or abuse of position.**

- We prohibit fraud, abuse of position and the situations that may result, as follows:
  1. Appropriation of Company assets or information.

2. Obtaining personal gain by taking advantage of the position or a position of trust granted by the Company.
  3. Acts of manipulation of operational reports or financial statements Company.
  4. Actions that are linked to theft and sabotage.  
Any Company other situation that goes against the
  5. integrity of the Company and of its people.
- We are permanently attentive to any event, indication or suspicion that represents a possible irregularity committed internally or by third parties, in breach of the **Corporate Policy on Fraud and Corruption**. We immediately report any such situation to the appropriate internal personnel or through the communication channels that the Company has made available.

### 3.7 REPRESENTATION OF OUR COMPANY

We know that the reputation of our Company depends on the behavior of each member of the Company, so our behavior must reflect our corporate values. It is important to highlight that only the representatives authorized by the Company may speak or make statements on behalf of the Company.

- We are not allowed to make statements, orally or in writing, on behalf of the Company without express authorization or due preparation, in accordance with Company policies.

## EXAMPLE

**What should I do if I am invited to a forum or conference to discuss my work?**

Remember that we are all responsible for protecting and strengthening the Company's reputation, so it is important to be aligned regarding the messages and information we give to external people. Therefore, you should request the authorization of your direct superior and seek guidance from the External Communications area.



## RECOMENDATION

Let us be careful with the personal comments or opinions that we make through social networks, so that these are not interpreted as the official position of the Company. We recommend that you mention in your accounts and / or social network profiles that "The opinions expressed via this medium are strictly personal".

- We ensure that our personal opinions are not interpreted as the position of the Company, therefore:
  1. We avoid using company letterhead or email to express opinions or conduct personal business.
  2. We take special care when directly or indirectly mentioning our Company on social networks, as well as issuing opinions that could be interpreted as the official position of the Company.
- We behave professionally and according to our values in internal and / or external events in which we participate, as members of the Company, even when we are outside of working hours (for example: conferences, fairs, symposiums, courses, inaugurations, awards ceremonies, among others).
- We are concerned with aligning our partners, agents, suppliers, clients and especially those who act on behalf of our Company, vis-à-vis public officials or third parties in order to verify that they understand and comply with the Company's Ethical Commitments.

WITH  
CUSTOMERS,  
CONSUMERS,  
SUPPLIERS, AND  
COMPETITORS



**WE ARE COMMITTED TO ENSURING THAT  
OUR RELATIONSHIPS WITH CUSTOMERS,  
CONSUMERS, SUPPLIERS, AND  
COMPETITORS ARE BASED ON RESPECT,  
TRANSPARENCY, AND LONG-TERM  
DEVELOPMENT**

## 4.1 FAIR AND ETHICAL RELATIONSHIP

**We develop our business relationships under the premise of respect, fairness, and high ethical standards.**

- We treat our partners, suppliers, customers, consumers and competitors with fairness and Ethics, complying with all applicable free competition laws. For this reason, we take care that the interest in achieving the objectives defined by the business does not affect our personal reputation or that of our Company by being involved in unethical and unfair transactions.
- We honor our promises, agreements, and commitments.
- We value the fact that our suppliers and clients share our Ethical guidelines. We seek to promote good practices in our supply chain as defined in the **Corporate Responsible Supply Policy**.
- We compete based on high ethical standards and with strict respect for the laws that regulate free markets and free competition. As such, we thus:
  1. We do not abuse our market position with any of our products in the geographical areas where we operate.
  2. We act with integrity and understand that it is not acceptable to manipulate or misuse information that could harm our competitors.
  3. We do not establish agreements with our competitors to not participate in certain markets or with certain clients, or to exclude any client or supplier in an attempt against free competition in any of its forms.

## 4.2 PRODUCT SAFETY AND RELIABILITY

**We offer products with the highest and most demanding quality standards to our consumers. We are transparent and truthful with the information we disseminate on our products in order to maintain the trust that our customers and consumers place in our brands and products.**

- We are committed to developing quality products, as well as revealing transparent information to consumers that allows them to select our products responsibly.
- We rigorously review the content of our advertising and promotional materials to comply with the veracity of the information and with the applicable local regulations.
- We strive to raise our quality standards to more demanding levels, which is why we have the necessary certifications, improve our management systems, and carry out periodic audits.

## EXAMPLE

**A representative of a competing company has invited me to a meeting to discuss prices. What should I do?**

You must reject the invitation. Remember that you are not allowed to participate in conversations and / or agreements with competitors related to prices, conditions of sale or other issues concerning the commercial activity of the Company. For more information, check the **Free Competition Policy**.

# WITH THE GOVERNMENT, THE COMMUNITY, AND THE ENVIRONMENT



**WE ARE COMMITTED TO RESPECTING THE ENVIRONMENT IN WHICH WE CARRY OUT OUR ACTIVITIES, COMPLYING WITH THE LAWS OF THE LOCATIONS IN WHICH WE ARE PRESENT. WE CARRY OUT OUR ACTIVITIES WITH THE HIGHEST ETHICAL STANDARDS, WHICH IS WHY IT IS STRICTLY PROHIBITED TO PARTICIPATE IN ACTS OF CORRUPTION OR UNDUE INFLUENCE TOWARDS PUBLIC OFFICIALS. WE CONTRIBUTE TO STRENGTHENING THE COMPANY'S POLICY OF ZERO TOLERANCE TO ACTS OF CORRUPTION, THUS WE ARE COMMITTED TO REPORT ANY FACT OR SUSPICION OF IMPROPER CONDUCT OF WHICH WE ARE AWARE.**

**WE KNOW THAT, IN THE FACE OF ANY DIFFICULTIES, WE HAVE A HUMAN TEAM THAT SUPPORTS US AND WILL HELP US ACHIEVE THE OBJECTIVES ESTABLISHED WITHOUT COMPROMISING OUR VALUES AND THE FULFILLMENT OF OUR ETHICAL COMMITMENTS.**

## 5.1 CORPORATE CITIZENSHIP AND PREVENTION OF ACTS OF CORRUPTION

It is important for us to have an active role in the locations where we are present. We act with transparency and integrity, respecting the law and complying with applicable regulations, thereby protecting the Company's reputation.

### PREVENTION OF ACTS OF CORRUPTION AND BRIBERY

- We reject any type of act of corruption and bribery, acting with transparency and integrity in all our processes in accordance with the anti-corruption policies implemented by the Company. These include: **(i) Corporate Policy on Fraud and Corruption (II) Corporate Policy on Donations (III) Corporate Gifts and Hospitality Policy (IV) Corporate Conflict of Interest Policy (v) Corporate Policy on Ethics and Compliance**, among others.
- We do not offer or pay incentives and contributions, directly or indirectly (through an agent or third parties), to achieve benefits in public or private entities. Nor do we receive bribes, directly or indirectly (through an agent or third parties), for our own benefit or for the benefit of the Company in order to influence a transaction of an financial or commercial nature.
- We take special care to prevent payment offers or some type of benefit to public officials during negotiations, management or procedures related to the Company's operations.

## RELACIONAMIENTO CON FUNCIONARIOS PÚBLICOS Y CONTRIBUCIONES POLÍTICAS

- We respect the authority of entities and public officials wherever we conduct our business, and we maintain honest and ethical relationships with these.
- We carry out our activities independently of the politics without being influenced or conditioned by the government. Our Companies do not make contributions or donations outside the law.
- The Company does not make contributions or donations that appear or have the purpose of influencing the good judgment of public institutions, and nor of their representatives or officials.
- The Company does not offer gifts to public authorities or officials, except in exceptional cases and under the guidelines outlined in the respective policy.
- The Company always observes a prudent attitude and is attentive to warning signs that could compromise it and / or be interpreted as a departure from the Ethical line of conduct. This is also applicable when the members of our Company wish to participate in political activities:
  1. We do this without interfering with the fulfillment of our functions or responsibilities. Remember that we must inform the Company of any potential conflict of interest situation.
  2. We ensure that our statements and political opinions are not interpreted as the position of the Company, as they are personal.

## PREVENTION OF MONEY LAUNDERING, TERRORISM FINANCING AND DRUG TRAFFICKING

- We comply with the regulations regarding the prevention of money laundering and terrorism financing, and we support local and international efforts to prevent financial crime. As such, we carry out actions to prevent our activities from being used for illicit operations that threaten the legitimacy and transparency of local and international trade.
- We seek to continually improve the processes, operations, and security protocols of our supply chain, with the aim of avoiding the occurrence of illegal activities, such as drug trafficking and smuggling.

## COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

- We responsibly and proactively manage the Company's image and reputation, so we avoid interacting with companies or individuals who violate local laws and regulations.
- We promptly report any suspicion of non-compliance with legal or regulatory obligations through the communication channels that our Company has made available to us.
- We support local and international efforts to prevent illegal activities.
- We comply with applicable laws and regulations, we pay taxes, remuneration, gratuities, and legal obligations as per schedule.

## COMPLIANCE WITH FOREIGN TRADE LAWS

- At our Company, we believe that foreign trade encourages economic development, so when operating in other countries we insist on complying with all the regulations and legislation requested by the host country's authorities.

## HUMAN RIGHTS

- We act responsibly, respecting the human rights stipulated in current regulations and in the International Charter of Human Rights, maintaining a firm commitment to compliance.
- We guarantee that employment is freely chosen, and we reject labor exploitation, child labor and forced labor. Likewise, we do not participate in businesses that promote practices contrary to human rights.
- We recognize the right of the people in our Company to freedom of association.

## 5.2 SUSTAINABILITY

**We seek to generate value and well-being in society, that is why we manage our natural resources in an efficient and responsible manner, promote healthy habits, and enhance capacities throughout our value chain.**

- We strengthen our value chain, enhancing capabilities throughout, in order to generate employability and entrepreneurship.
- We are committed to protecting natural resources and developing environmentally sustainable activities. Therefore, we comply with the environmental laws and regulations

applicable to our businesses and promote efficient resource use.

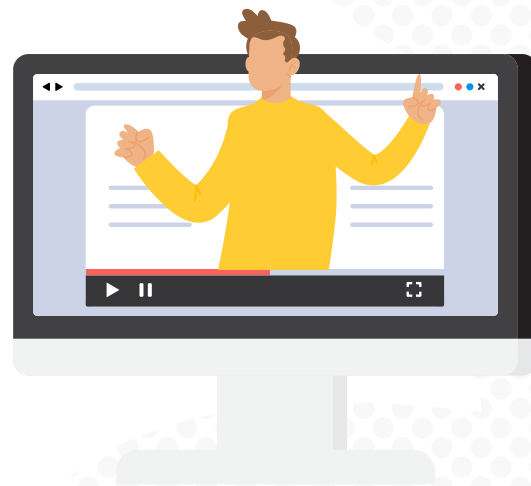
- We promote healthy habits and lifestyles in society.
- We implement projects and initiatives that promote the development and well-being of the communities where we operate, thereby complementing the efforts of the government.
- We maintain respectful and transparent relationships with the communities that surround us and seek mutual benefit, while at the same time respecting and upholding the laws, customs and traditions of the places where we operate.



## RECOMENDATION

Any donation request must have the authorization, expressed in writing by physical or electronic means, from the Country Manager, Vice President of Corporate Affairs or General Manager, according to the approval criteria defined in the Corporate Policy on Donations.

# WITH THE MEDIA AND ASSOCIATIONS



**WE ARE COMMITTED TO SHARING  
PERTINENT INFORMATION WITH OUR  
STAKEHOLDERS REGARDING THE  
COMPANY AND ITS OPERATIONS IN AN  
ACCURATE, TIMELY AND TRUTHFUL  
MANNER. FOR THIS PURPOSE, WE USE  
AUTHORIZED CHANNELS AND  
REPRESENTATIVES.**

## 6.1 RELATIONSHIP WITH THE MEDIA

- We understand that the disclosure of inaccurate and late information can damage the reputation of our Company, thus we disclose relevant information to our stakeholders in an accurate, timely and truthful manner.
- We have authorized spokespersons to serve the interest groups with which the Company communicates.
- We respect freedom of the press and of expression.
- We are governed according to the norms established by the country's ethical and advertising codes.
- We seek that opinion leaders recognize that we act in a responsible, fair and committed manner.

## EXAMPLE

Leaving work, a reporter approached me to ask me for statements and to find out what the Company's position is regarding a news item published in a newspaper regarding our businesses. What should I do?

- Do not give statements.
- Ask the reporter for their details (name, contact number and the media company to which they belong) and immediately send this information to the Corporate Affairs Area (External Communications) and / or to the person designated by the Country Manager.
- Tell the reporter that the Company's official spokespersons are the only ones authorized to give statements on behalf of the Company and / or its brands.



## RECOMENDATION

Let us be careful with the personal comments or opinions that we make through social networks, so that these are not interpreted as the official position of the Company. Let us take the same care when participating in meetings, forums, etc.

## 6.2 RELATIONSHIP WITH ASSOCIATIONS

- To represent our Company before associations, explicit authorization from General Management is required.
- The representatives of our Company act responsibly in their actions and decisions, as these affect the Company's reputation.
- We aspire to promote and share our experiences in public and private instances, as long as they are part of a plan to contribute to the well-being of the community.

# 7 OUR REPORTING CHANNELS



When we become aware of a situation of possible non-compliance with our Guide to Ethical Commitments or our policies, we must report it immediately. For this, we have the following channels:

- Communicate the situation to your supervisor or direct superior.
- Communicating to the Human Resources leader of your choice; for example, to your Manager or to your Human Resources Business Partner.
- Communicate the case through the Alicorp Ethics Hotline. This channel is operated by an independent firm, that has various platforms and allows for anonymous reporting.

In our Company we promote an environment of trust and respect, which is why the reports received will be handled with confidentiality, guaranteeing that the person who reports them is free from retaliation. The reports will be sent to the corresponding Ethics Committee for review.

For our reporting channels to function properly, it is especially important to:

- Provide as much information as possible regarding the irregularity that we report. The more information that is available, the better the investigation will be.
- Act in good faith by providing truthful information.

## WHAT AM I REQUIRED TO REPORT?

- Any suspicion must be reported, such as:
  1. Illegal or unethical conduct.
  2. Breaches of legislation, regulations, policies, protocols and procedures.
  3. Breaches of our Guide to Ethical Commitments.
  4. Third-party background information, as indicated in 5.1.
- Some examples of irregularities that we must report:
  1. Theft of Company assets.
  2. Conflict of interest, including the relationship of an employee or third-party with public officials.
  3. Payment of bribes to public officials.
  4. Request for bribes in private tenders.
  5. Inappropriate gifts and entertainment.
  6. Confidentiality violations.
  7. Misuse of Company assets.
  8. Inappropriate use or destruction of records.
  9. Document forgery.
  10. Inappropriate billing, etc.
  11. Sabotage or systematic malpractice



## RECOMENDATIONS

- Do not assume that the Company already knows about the irregularity.
- Pay attention to signs of irregular situations.
- If you have questions, check out our Guide to Ethical Commitments and our Policies.



## RECOMENDATIONS

If you have questions about what to report, consult with a person not related to the facts (for example, the Legal and Compliance area, the management of your area, the Internal Control area, the Human Resources area, or a member of the Ethics Committee).

## WHAT INFORMATION SHOULD I PROVIDE?

- When reporting a possible breach, it is important to provide as much information as possible, thus facilitating the analysis and review of the reported situation. To the extent possible, a full report should help answer these questions:
  1. Who is (are) the person(s) responsible / the person(s) involved?
  2. What is (are) your responsibility (ies) or
  3. position(s)?
  4. What did (did) they do?
  5. What happened?
  6. When did it happen?
  7. Where did it happen?
  8. For how long did it happen?
  9. Is it still happening? Where is the supporting evidence?
  10. Does anyone else know of this situation?
  11. Has this fact been previously reported? How? What happened?



## RECOMENTADIONS

- Explain the facts clearly and chronologically, including all the details and concrete data you can (amounts, dates, people, suppliers, characteristics, products, etc.).
- If you have evidence, try to send it electronically or physically through the available channels.
- The more valid and verifiable information you provide, the greater the possibility that the case will be reviewed.
- Please offer a manner to contact you, in the event that you wish to speed up the investigation.

## WHAT PLATFORMS DOES THE ETHICS HOTLINE USE?

The platforms available that can be used to report an irregularity through the Ethics Hotline are:

### Página Web

You can access the following website via the Internet

[www.lineaeticaalicorp.com](http://www.lineaeticaalicorp.com)













- This page contains questions and guides that will help you report the irregularity quickly and easily.
- Available for when you require it.
- No username or password is required to enter.

**YOU CAN ALSO ACCESS  
THE ALICORP ETHICS  
LINE BY SCANNING THE  
FOLLOWING QR CODE:**



## Telephone numbers

At any time of your choosing, you may communicate with a consultant from an independent firm using the following telephone numbers:

 Country	 Telephone number	 Country	 Telephone number
 Bolivia	800-10-4561	 Mexico	800-681-6945
 Colombia	844-397-3235	 Peru	0800-78510
 Chile	800-914-243	 Uruguay	000-401-912-22
 Ecuador	1800-001-163		
 Honduras	504-2235-9286		

TELEPHONE NUMBERS ARE AVAILABLE 24 HOURS A DAY.

## HOW WILL THE INFORMATION REPORTED BE USED?

- All reported irregularities will be recorded and will be evaluated whether they have sufficient weight as to analyze and widen any investigation.
- When making the reviews, the confidentiality of the case and the request for anonymity of the person who provided the information will be respected. Every effort will also be made to keep identities as confidential as possible, according to the need for more detailed investigation.
- If after the investigation process, verification shows that there has been a breach of the provisions of the Guide to Ethical Commitments, as well as of the policies, procedures and regulations of the Company, the necessary measures will be taken. This could imply the application of sanctions and disciplinary measures, as indicated in the applicable laws, the Internal Work Regulations and other internal policies of the Company. In addition, where appropriate, the initiation of legal actions and the application of sanctions imposed by the Government.
- For internal and regulatory purposes, the Company reserves the right to save and protect historical information from cases received.

## COMMITMENT OF THE PERSON RECEIVING THE REPORT

- The Company's leaders and members of the Legal and Compliance Areas, as well as Human Resources are our main reporting channels. They have the duty to ensure safe spaces where our employees can formulate reports, complying with these guidelines:
  1. Take any irregularity reported with absolute seriousness.
  2. Ensure the confidentiality and anonymity of the reporting employee, if requested.
  3. Not to discuss the case with peers.
  4. Listen carefully to everything the employee has to say without interrupting.
  5. Only ask questions relevant to the case.
  6. Take note of the case and communicate it to the Ethics Committee or Legal and Compliance Area.
  7. In no way retaliate against the reporting employee.
- Although in some cases the Company's leaders can take immediate corrective actions against an ethical breach, reporting the situation to the corresponding Ethics Committee is required. Remember that the committees are responsible for strengthening our Ethical Culture and consequently they must be fully aware of any breach.

# 8

## GLOSSARY



## MISAPPROPRIATION OF ASSETS

- The act of using Company assets or those for which one is responsible, and / or of which has the permanent or temporary custody, for one's own benefit or that of third parties.

## ANONYMOUS

- Condition of a document or information whose author is not known.

## ALTERATION OF COMPANY RECORDS, REPORTS OR DOCUMENTS

- Alteration, misrepresentation or false presentation of accounts, records, documents or reports that do not reflect the reality of the Company's operations (for example, alteration of expenses, manipulation of overtime, falsification of documents, adulteration of reports).

## INAPPROPRIATE PERSONAL BEHAVIOR

- Discrimination, intimidation, harassment or other modalities.

## CONFLICT OF INTERESTS

- Situation in which the behavior of a member of the Company is seen - or could be seen - as influenced by external factors. As an example: hiring family members, hiring companies related to the employee, etc. Depending on the circumstances, the relationship of a member of the Company with public officials could also qualify as a conflict of interest.

## ACT OF CORRUPTION

- Offer, give or promise, under any modality, to a public official or any natural person, a donation, promise, advantage or benefit so that he / she performs or omits acts, lacking or not in his / her obligations. Corruption includes acts such as

bribery, fraud, taking advantage of the position, influence peddling, among others.

## CASE

- Irregularity reported to the Ethics Committee.

## ETHICS COMMITTEE

- It is responsible for promoting ethical behavior in the Company, as well as ensuring compliance with the Guide to Ethical Commitments and Company policies.

## CONFIDENTIAL

- Condition of a document or information that is made or said in confidence between two or more people, with the certainty that it will be kept confidential in that group.

## FRAUD

- Any act or intentional omission designed to deceive others, carried out by one or more people, in order to appropriate, take advantage of or possess the property of another - whether physical or intangible - in an undue manner, to the detriment of another, and generally due to the lack of knowledge or malice of the person affected. Fraud is considered the use of the position assigned by the Company to achieve personal or third-party gain through the misuse of the Company's resources or assets; for example: misappropriation of assets, alteration of Financial Statements or other reports, etc.

## GUIDE TO ETHICAL COMMITMENTS

- A guide that establishes the Ethical and behavioral standards to be followed by the members of the Company in relation to its stakeholders as well as to other members of the Company, shareholders, customers, suppliers, the competition, the State, society, the environment, the media, opinion leaders,

unions and associations.

## **PUBLIC INFORMATION**

- Information that may be known by anyone inside and outside the Company. There is no restriction on public information discussion and it can take place anywhere.

## **ETHICAL BREACH**

- Situation that implies a possible infringement against internal regulations, breaches of Ethics, illegal conduct, breaches of current laws and other breaches related to ethical behavior committed by employees or Company executives.

## **CONFIDENTIAL INFORMATION**

- Information that should be known only by a small group of people in the Company. Disclosure of this type of information may harm the Company or its employees. Confidential information can only be disclosed to people who require it for work purposes. When necessary, the personnel involved should explicitly communicate what is confidential information.

## **LEGAL BREACH**

- Failure to comply with the laws or regulations applicable to the Company for his or her personal benefit.

## **BREACH OF POLICIES, PROTOCOLS OR PROCEDURES**

- Failure to comply with policies, protocols or operational or administrative procedures that do not imply other types of irregularities mentioned above.

## **ETHICS HOTLINE**

- Channel that serves to receive through various means (email, website, telephone service, among others) serious and sensitive irregularities related to breaches of the Guide to Ethical Commitments. It is operated by an independent professional firm specializing in the field. The Ethics Hotline is available to all employees through its different mechanisms 24 hours a day, 7 days a week, 365 days a year.

## **NON-RETALIATION**

- Employees who wish to report an irregularity under the terms defined in this protocol have the guarantee that they will not be threatened or retaliated against with disciplinary measures for having reported any identified misconduct in their environment in good faith.

## **BRIBERY**

- Offer, promise, delivery, acceptance or request of an undue advantage of any value, directly or indirectly, and regardless of its location, in violation of applicable law, as an incentive or reward for a person to act or stop acting in relation to the performance of that person's duties. Also, bribery is considered a type of corruption.

## **ABUSE OF OFFICE OR AUTHORITY**

- Any dishonest activity carried out by a Company employee, who acts against the interests of the Company and abuses their position, function or means to obtain a benefit or advantage for oneself or a third-party.

# **allicorp**