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CODE OF ETHICS AND BUSINESS CONDUCT

Prepared / Modified by:	Reviewed by:	Approved by:
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Date: 20/08/2024	Date: 20/08/2024	Date: 20/08/2024

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1. OBJECTIVE

The Code of Ethics and Business Conduct (hereinafter, the “Code”) of El Pedregal S.A. (hereinafter interchangeably referred to as “Pedregal” or the “Company”) establishes the standards of conduct expected to be respected and adhered to by our employees, promoting integrity and transparency. It helps us make ethical decisions, shows us how to identify potential misconduct, and encourages exemplary standards of conduct among our employees both within and outside the organization, as well as in our interactions with third parties.

The Code of Ethics and Conduct will assist us in safeguarding the well-earned reputation of Pedregal among employees, clients, suppliers, and other stakeholders.

2. SCOPE

The Code of Ethics and Conduct applies to all personnel working at Pedregal, regardless of their position as an intern, worker, employee, or executive.

Each employee is obliged to comply with and ensure the enforcement of the Code’s standards and/or guidelines, applying them appropriately to our daily activities. Our goal is to go beyond mere compliance with the law and our policies, guiding our conduct and decision-making to work in a fair and trustworthy manner.

Similarly, it is expected that any third party entering into a commercial relationship with Pedregal will respect our values and demonstrate high standards of ethical conduct. We will make our best efforts to communicate and enforce our expectations in relation to our Code.

3. REFERENCE DOCUMENTS

- RG2-GH-001 Internal Work Regulations
- Universal Declaration of Human Rights
- International Bill of Human Rights
- Declaration of the International Labour Organization (ILO) concerning the Principles and Rights at Work

4. DEFINITIONS

- 4.1. Workplace Harassment:** Practice exercised in the workplace and consisting of any systematic and constant attitude or behavior of a person or group towards another in the workplace that threatens their dignity and psychological, physical and/or emotional integrity, degrading their work environment and attempting against their employment position creating an unpleasant or hostile environment for the affected person. Workplace harassment can be downward (from bosses to subordinates), horizontal (between coworkers) or upward (from subordinate to bosses).
- 4.2. Sexual Harassment:** It is any behavior, verbal or physical, of a sexual nature that has the purpose or has the effect of violating the dignity of a person, when an intimidating, degrading or offensive environment is created.
- 4.3. Attacks on Archaeological Monuments:** Whoever settles, preys or who, without authorization, explores, excavates or removes pre-Hispanic archaeological monuments or paleontological areas declared as paleontological heritage of Peru, regardless of the real right held over the land where it is located, if it is known the character of cultural heritage or paleontological heritage of Peru.

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- 4.4. Conflict of Interest:** It is referred to those situations in which personal private interest - professional relationships or personal economics' interests - interfere or can be understood to interfere with the performance of their job duties.
- 4.5. Confidentiality:** It is what is done or said in the confidence that the confidentiality of what was done or said will be maintained.
- 4.6. Environmental Care:** Represents all those behaviors which living beings shall take for caring the nature. The purpose is to make an environment with more opportunities and more benefits satisfying the life of all generations.
- 4.7. Dishonesty:** Lack of veracity in words or in the acts.
- 4.8. Discrimination:** Any kind of declaration or action based on race, origin, color, age, sexual orientation, genre, incapacity, pregnancy, maternity, civil status, civil union, cultural, political or religion beliefs.
- 4.9. Financing of Terrorism:** It is consisted of collecting licit or illicit funds to finance terrorists, terrorist organizations, extremist organizations or terrorist acts.
- 4.10. Money laundering:** Any transaction or series of transactions by which the true origin of illicit fund is covered or for appearing that such funds have been obtained in legal activities.
- 4.11. Ethical Line:** It is a claim system created for preventing, identifying, and dissuading irregular and/or fraudulent conducts, with a 24/7 availability, 365 days.
- 4.12. Gifts, Bribery and illegal commissions:** Giving or receiving gifts or other benefits as a source of high risk in terms of corruption.
It may mean any sum of money, fee, commission, credit, gift, gratuity, object of value or compensation of any kind that is given, either directly or indirectly, to any employee, supplier, employee of the supplier for the purpose of obtaining or improperly rewarding favorable treatment in connection with a contract or bargaining agreement.
- 4.13. Refusal, delay and falsehood in the provision of information:** Whoever refuses or delays providing the competent authority with the requested information or deliberately provides the information in an inaccurate manner or provides false information.
- 4.14. Reprisal:** Response of punishment or revenge for some aggression or offense. Prohibited forms of retaliation include, but are not limited to, offensive statements or actions, harassment, discrimination, dismissal, suspension of employment contract, threats, blacklisting, as well as denial of benefits.
- 4.15. Robbery or Theft:** Unauthorized suppression or taken of supplies, furniture, accessories, products, money in cash, goods, or other tangible assets, appropriate someone else's properties, by using or not force or intimidation with profit motive in mind.
- 4.16. Occupational Health:** Multidisciplinary science, which aims to promote and maintain the highest possible degree of physical, mental and social well-being of employees in their workplaces; prevent any damage due to illness or accident caused to health due to employment conditions; protect them in their employment against risks resulting from the presence of agents harmful to their health.

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4.17. Terrorism: Whoever causes, creates or maintains a state of anxiety, alarm or fear in the population or in a sector of it, carries out acts against life, body, health, personal freedom and security or against property, against security of public buildings, roads or media or transportation of any kind, power or transmission towers, motor facilities or any other good or service, using weapons, explosive materials or devices or any other means capable of causing havoc or serious disturbance to public order or affect international relations or the security of society and the State.

Includes all collaboration with terrorism, affiliation with terrorist organizations, instigation to commit the crime of terrorism, recruitment of people, conspiracy to commit the crime of terrorism and obstruction of justice.

4.18. Influence trafficking: To influence into an official or public authority through a situation of prevailing for obtaining an economic benefit through a Court Order.

4.19. Human Trafficking: When, using violence, threat or another form of recruitment, a person is retained for purposes of exploitation, inside or outside the Country.

5. DEVELOPMENT

5.1. Responsibilities

Our Code does not aim to be a comprehensive compilation of all conduct rules and cannot cover every situation. Therefore, management has the responsibility to ensure that these guidelines are adhered to throughout Pedregal and are aligned with the principles of sound global governance, as well as in accordance with current laws and regulations. In scenarios not addressed in our Code, good faith and applicable legislation shall prevail.

Our Ethics and Business Conduct Committee (hereinafter referred to as the "Committee") is composed of various areas within the Company to avoid conflicts of interest regarding any reports that may be submitted. The structure is detailed in Annex 01: Organizational Chart of the Committee.

The individuals designated and appointed, as detailed in Annex 02: Committee Members, will be responsible for forming each specific Committee according to the nature of the report to ensure objectivity, impartiality, and independence in decision-making.

The Chairperson will be the same for all Committees, taking into account that they also hold the position of "Responsible for the Prevention Model focused on corruption risks, money laundering (ML), and financing of terrorism (FT)."

The Committee shall ensure compliance with the Code and conduct an investigation process in the event of any breaches. The Human Resources Management, Labour Relations Deputy Management, and, where applicable, the management of each farm will be responsible for implementing the administrative sanctions resulting from the investigation of each report.

5.2. General Considerations

- A.** Pedregal is particularly keen on being recognized in the industry for its impeccable track record, social responsibility, beliefs, and commitment to the environment and the community. Therefore, it is the obligation of all its employees to project a positive image and refrain from any conduct, whether professional or personal, that may jeopardize the image and good name of Pedregal.

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- B.** A company known for its reputation is a desirable partner for collaboration, a place where the most talented individuals wish to work, a trusted entity for customers, and a project in which one can invest with confidence.
- C.** Good reputation is one of the most valuable assets a company can possess, as it is linked to its ability to meet expectations and convey trust. Thus, it is necessary to manage corporate reputation in a strategic, coordinated, and systematic manner.
- D.** Every employee must:
 - a. To know, respect, and fulfill the provisions of Code and additional guidelines applied to our position.
 - b. To fulfill with law, this Code and all policies.
 - c. To request orientation, immediately, in case of doubt and accept a guide when it is required for “doing the right thing”, being responsible of our decisions.
 - d. To speak without reservations if we believe our code or policies are not fulfilled in any way.
 - e. To report, timely, about any fact against good manners and provisions established in the Code according to the proceeding therein established.
 - f. To participate in all trainings sessions.
 - g. To cooperate, be an open and sincere person in any investigation, auditing process, and other revisions including those performed by third parties or tax authorities.
 - h. To act following basic basis of integrity, responsibility, team spirit and excellence.
- E.** If you have workers in charge, you have additional responsibilities:
 - a. To guide with integrity and compromise.
 - b. To be a positive model and support your team.
 - c. To ensure that team members, inclusive all those who recently have entered Pedregal, understand principles and expectations of the Code, law and policies applied to their jobs.
 - d. To create a respectful, open and inclusive environment.
 - e. To encourage your team to speak up and seek guidance when they have questions or concerns.
 - f. To look for help, if you are not sure about the focus, or the best decisions to be taken.
- F.** Failure to comply with the obligations contained in the Code, its policies, and operational procedures, in accordance with the provisions of RG2-GH-001 Internal Work Regulations, as well as current labour regulations, may result in disciplinary measures, including written reprimands, suspension, dismissal, or non-renewal of contracts, depending on the nature and severity of the offence.

5.3. Matters Covered the Code of Ethics

A. Law Compliance

All employees of the company, regardless of their status as interns, workers, employees, or executives, must ensure compliance with the legal, internal, national, and international norms, policies, and regulations applicable to the activities of Pedregal. As an organization, we have a risk-based prevention model and a suitable supervisory structure that help us maintain a culture of prevention and control.

We are all responsible for complying with the law, both within and outside our work environment. We must perform our duties diligently and be knowledgeable about, keep up to date with, and disseminate the specific regulations related to the exercise of our functions.

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In cases where the interpretation of applicable laws and regulations is unclear, employees may consult, without limitation, our internal legal department, which, in turn, has access to legal advice across the various businesses of Pedregal.

B. Spreading of Internal Regulations

Pedregal is committed to providing timely, consistent, and accurate dissemination of the Code to its employees. All employees of Pedregal are expected to comply with the provisions contained therein. The Committee will be the only body authorized to issue statements or pronouncements on behalf of Pedregal regarding any matters contrary to this Code.

C. Confidentiality and Handling of Information

Information is intertwined with every aspect of our work. Protecting it is a significant responsibility for all of us.

During the course of our functions and business activities with Pedregal, we may come into contact with confidential or privileged information, which must not be made available to the public.

Confidential information belonging to Pedregal, and it may include without restrictions nor limitation:

- Details related to the Pedregal, clients, prices, markets, equipment, sales, profits, report of internal figure, among others.
- Information related to investigations and development.
- Information related to the Company's know how¹.
- Technical information related to our products, services and processes.
- Information related to our marketing and services' strategies.
- Details related to current or possible fusions, acquisitions or sales of assets.
- Information related to employees and human resources, among others.
- Agreements.
- Prototypes and management's models.
- Developing products.
- Industrial secrets.


We must prevent the disclosure or unauthorized access to confidential information for third parties. These obligations will remain in effect even after the termination of our employment relationship with Pedregal.

All employees of Pedregal must ensure they understand which information is public or non-confidential that can be shared with third parties, provided it does not pose a risk of harm to Pedregal and with prior consultation with their immediate supervisor. In no case should confidential information be used for personal benefit, or that of other employees, family members, or third parties.

Directors, managers, and employees whose duties require access to confidential information are the only ones authorized to access it and are obliged to assist the Systems Area of Pedregal in carrying out the respective backup² as a procedure for safeguarding information.

¹ Group of technical and administrative essential knowledge for carrying out commercial process of Pedregal and which are not protected under a patent.

² Backup of one or more computer files to prevent data loss.

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All employees of Pedregal whose roles are associated with the creation, entry, modification, deletion, consultation, and viewing of information commit to handling it honestly, entering accurate data that reflects the activities of the process to which they are associated, even in conditions that may be unfavorable for their performance evaluation; and must not access information not related to their duties through direct or technological means.

Additionally, they should not access information systems with the intent to disrupt the normal flow of information or the local or remote security of those systems (i.e., not as “hackers” or security violators).

Treat all information with care and take precautions before revealing it to anyone, inside or outside of Pedregal. Share information only with those who have the right to know it. Do not publish information from Pedregal in public forums or on social media.

Always keep your passwords confidential and do not share them with colleagues or others. Lock your screen and any tablet devices, keep your mobile equipment secure, and exercise particular caution in public places. Protect highly confidential documents with passwords, and store confidential documents and laptops in a secure location, especially from one day to the other day.

D. Commercial Relationships: Competition and Fair Treatment

Relationships with clients and suppliers are essential for the continued success of Pedregal; therefore, we develop our business relationships based on the principles of respect, fairness, and high ethical standards.

Workers must conduct themselves with honesty, integrity, and respect in their dealings with competitors, clients, and suppliers, and ensure the confidentiality of all information provided to them, unless required by law to disclose it or with the client’s or supplier’s authorisation.

We seek for our suppliers and clients to share our ethical guidelines.

We compete based on high ethical standards and with strict adherence to the laws governing free trade


E. Protection of Personal Data

We comply with the applicable laws and regulations regarding personal data protection.

Pedregal will designate authorized individuals for the collection and maintenance of personal information about Company employees, clients, and suppliers, ensuring the right to personal data protection as set forth in Law No. 29733 on Personal Data Protection and its Regulation Supreme Decree No. 003-2013-JUS.

We ensure the appropriate processing of this data within a framework that respects the fundamental rights it enshrines.

Therefore, all information provided will be collected into a Personal Data Bank established for this purpose, under the responsibility of Pedregal, which will adopt the necessary legal, technical, and organizational security measures to prevent loss, misuse, alteration, unauthorized access, and theft of personal data, as well as to maintain confidentiality regarding said personal data, except where disclosure is mandated by a Jurisdictional Body or required by the National Directorate of Justice under the Ministry of Justice.

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Personal information about employees will be disclosed to third parties outside of Pedregal only in accordance with the consents previously granted by the employees, for statistical, performance-related purposes, or in cases required by law.

Our employees, suppliers, business partners, and clients must handle the personal data to which they have access in a secure and confidential manner, as stipulated in contracts.

F. Attacks against Archeological Monuments are not allowed

At Pedregal, we do not allow or accept the destruction of pre-Hispanic archaeological monuments or paleontological zones declared as paleontological heritage of Peru.

We instill and promote among our employees a commitment to safeguarding archaeological monuments and reporting, in a timely and proper manner, any archaeological findings encountered at any of our sites.

G. Environmental Care

Pedregal is committed to protecting the environment and conducting its business activities in a responsible and sustainable manner.

To achieve this, we rely on the support and participation of our employees as well as the effective leadership of our management team. We must all respect and comply with the laws, regulations, and practices adopted by Pedregal concerning environmental protection.

As an agro-industrial company, our priority is to ensure the conservation and responsible use of natural resources, including water, energy, soil, and air.

Priorities for the company include the responsible use of water and energy, reducing waste and emissions, recycling, minimizing the impact of our products and packaging, and measuring our carbon footprint to reflect all greenhouse gases emitted directly or indirectly by our processes, with the goal of reducing them.

We also encourage our employees to seek opportunities to reduce waste and energy consumption, recycle, turn off equipment when not in use, promote the use of eco-friendly supplies and materials, and minimize work travel whenever possible.

H. Refusal, Delay and Falseness in Providing Information

It is prohibited to refuse or delay the provision of information requested by the competent authority, or to deliberately provide inaccurate or false information.

I. Conflict of Interest

Conflicts of Interest are situations in which an individual's judgement and the integrity of an action tend to be unduly influenced by an economic or personal interest.

Conflicts can be classified as:

- Potential: There is no conflict of interest at present, but certain circumstances in the future may lead to one.

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- Real: When an interest partially influences the performance or partiality of the activities of a Pedregal employee.

All Pedregal employees must avoid situations that may place them in such conflicts, and if faced with such situations, they should know how to act and understand the legal and ethical implications of their actions.

The Code cannot cover all possible conflicts of interest that may arise in reality.

Some common situations of conflicts of interest—though this list is not exhaustive—include:

- Making decisions or conducting transactions with clients, suppliers, or competitors with the intent to generate some personal benefit, either direct or indirect, instead of what is best for the company.
- Making investments, while being an employee, that grant us decision-making power in supplier, client, or competitor companies, or with those we have a relationship, except when there is explicit approval from General Management.
- Using the company's assets, personnel, and/or resources for personal benefit.
- Engaging in other activities that interfere with or directly or indirectly conflict with our activities or duties within the company.
- Hiring individuals who have relatives within the company up to the fourth degree of consanguinity, marital, or by affinity, or who maintain a parallel employment relationship to the company, within the same area where there would be interaction in a subordinate or dependent relationship, and even in any other area of the company if it could generate a conflict of interest.
- Managing or having decision-making authority in commercial relations with clients or hiring of suppliers, with whom direct family members of our employees (spouse or partner, children, siblings, and parents) work.
- Providing services, within or outside working hours, to competitors of the company.

Let's act with transparency and ethics by reporting any situation of conflict of interest, whether real or potential, to our immediate supervisor and declaring it in the FT2-PRE-002 Conflict of Interest Declaration Form, or through the ethical hotline channels.

J. Political Activities and Contributions

We do not make political contributions, whether in cash or any other form. While we respect the political choices of our shareholders, directors, and employees, we do not participate in partisan political activities and prohibit proselytizing activities within our workplace.

K. Gifts and Invitations

Corporate gifts and business invitations are customary courtesies designed to foster goodwill between business partners. These can include invitations, personal discounts, and more.

It is not prohibited to offer or accept the gifts or corporate invitations detailed above if they are of reasonable value, which must comply with our Code and company policies

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L. Donations

As part of our sustainability strategy, Pedregal undertakes social development initiatives and donations aimed at improving the quality of life in communities surrounding our operations.

Through our donations, we do not seek to exert undue influence or conceal other services provided; rather, our goal is to make a positive contribution to the community.

All of our donations are made in good faith, comply with applicable laws and internal policies, have been reviewed and approved by the appropriate authorities (see donation policy), and are properly recorded in the company's accounting records.

M. Policy Regarding Bribery Situations

Bribery and corruption, in all their forms, are unacceptable and illegal. They also harm competition and markets, increase costs, and undermine the trust of our customers and partners.

Pedregal is committed to conducting its business activities with integrity and strictly prohibits corruption; we do not tolerate bribery or corruption in any form.

We comply with anti-bribery and anti-corruption laws wherever we do business by never giving or accepting anything of value in exchange for preferential treatment or to influence a decision. We expect everyone who works with or for us to adopt the same zero-tolerance approach.

Furthermore, all our contracts with suppliers, contractors, and service providers contain anti-corruption clauses.

We must not, directly or indirectly, accept, offer, promise, grant, or authorize the delivery of a bribe, undue commission, payment, or any other item that could be interpreted as such (gifts of significant value, entertainment, employment, contracts, or benefits of any kind) to a third party to influence their actions or decisions or to prevent them from acting, with the intention of obtaining contracts or an undue advantage.

Be aware that a bribe can be more than just a payment offered to improperly influence a decision: it can take the form of a gift, favor, loan, job, or even an offer of entertainment or travel.

If any member of Pedregal becomes aware of any activity of the aforementioned type, they must inform their immediate supervisor/manager and/or report it through the ethical line channels.

N. Influence Trafficking

It is prohibited for anyone with a relationship with Pedregal to use real or simulated influences to receive, make, give, or promise for themselves or for a third party, a donation, promise, or benefit in order to intercede with a public official who is to know or knows about a judicial or administrative case.

O. Money Laundering

Money laundering is understood as any transaction or series of transactions through which the real origin of illicit funds is concealed or made to appear as though they have been obtained from legitimate activities.

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This may involve hiding the origins of assets from illegal or criminal sources, whether in the form of goods, money, or other properties, within legitimate business activities.

Our contracts with suppliers, service providers, and third parties include anti-corruption, anti-money laundering, and anti-terrorism clauses.

Furthermore, to ensure that operations do not facilitate illegal organizations in concealing the proceeds of their criminal activities or use resources for committing illicit acts, Pedregal will implement the measures required by current law, and all its activities will be carried out under the strictest ethical principles and full compliance with laws and regulations related to the prevention of money laundering.

Pedregal will also provide any information that may be required at any time by either party to establish the legality of transactions, as well as information required for cooperation with the competent authorities.

P. Crimes related to Terrorism

All collaboration with terrorism, affiliation with terrorist organizations, incitement to commit terrorist crimes, recruitment of individuals, conspiracy to commit terrorist crimes, obstruction of justice, and financing of terrorism is PROHIBITED and regulated under Legislative Decree No. 25475.

Financing terrorism involves, by any means, directly or indirectly, within or outside the national territory, voluntarily providing, contributing, or collecting means, funds, financial or economic resources, or financial services or related services of any nature, whether of lawful or unlawful origin, with the aim of committing any of the crimes provided for in the legislative decree, any of the terrorist acts defined in treaties to which Peru is a party, or to achieve the objectives or ensure the existence of a terrorist group or individual terrorists.

Any crime related to terrorism is unacceptable according to the standards of conduct established at Pedregal, and as collaborators of Pedregal, we have the obligation to report real or potential situations regarding the commission of such crimes.

Q. Robbery or Theft

Unauthorized suppression or taken of supplies, furniture, accessories, products, money in cash, goods, or other tangible assets, appropriate someone else's properties, by using or not force or intimidation with profit motive in mind.

R. Security and Occupational Health

We are all responsible for making Pedregal a safe place to work.

Pedregal recognizes the importance of ensuring the safety of all personnel within our facilities and encourages involvement and participation in the continuous improvement process aimed at preventing workplace risks.

The safety of our employees is of utmost importance in every project undertaken by Pedregal. We are committed to providing a healthy, safe, and productive work environment across all our offices and sites.

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Employees at Pedregal must comply with all current regulations and policies regarding safety and health at work, continuously maintaining and improving the Occupational Safety and Health Management System designed to protect workers, implement controls, and eliminate risks associated with their activities.

It is Pedregal's policy to conduct regular Occupational Safety and Health practices, for which we have a duly established Occupational Safety and Health Committee responsible for ensuring compliance with safety measures within the company.

S. Non-Discrimination or Harassment

In Pedregal, we respect and work together to promote a workplace free from harassment. We do not tolerate any form of abuse or harassment.

This includes actions that can reasonably be considered offensive, hostile, intimidating, or discriminatory towards a worker, coworker, client, supplier, or a third party.

Pedregal prohibits discrimination in any aspect of the employment relationship on grounds of race, ethnic origin, cultural background, color, religion, sex, nationality, marital status, sexual orientation, disability, political orientation, union membership, or age.

It is our practice to maintain an environment of equality in the workplace, both within the company and externally, fostering fair treatment for all involved and preventing any distinction, exclusion, or preference based on race, color, sex, religion, marital status, political opinion, disability, or social, ethnic, or union origin that may nullify or alter the equality of employment opportunities before the law.

Pedregal accepts the participation of employees in the selection process of its representatives in committees against sexual and labor harassment at each level and scope, without any interference, providing chances and supporting the management and election.

It is expected that Pedregal's employees make reports before any member of committees, management's office or by using our communication channels, the harassment or another inappropriate conduct, as soon as possible.


T. Human Rights, Forced Labor, Human Trafficking and Child Labor

At Pedregal, we are committed to upholding the human rights recognized in the Universal Declaration of Human Rights, the Global Compact, and other national and international standards. We prohibit child labor and reject any form of forced labor or undignified working conditions.

We respect the right to freedom of association or non-association and the right to collective bargaining for our workers.

We do not engage with suppliers or production facilities where any form of exploitation or working conditions that violate human rights is found.

At Pedregal, we strive to eliminate discrimination in the processes of selection, training, development, evaluation, and retention of personnel based on cultural diversity, gender, sexual orientation, race, creed, religion, physical ability, or social status.

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We aim to create an inclusive environment, respecting and supporting the cultural, gender, sexual orientation, racial, creed, religious, physical ability, or social status diversity of our employees.

Our goal is to build a company where everyone feels integrated, respected, valued, and has equal opportunities for development.

All opportunities at Pedregal are based on the talent and merit of our employees in alignment with our values and behaviors. We provide salaries and benefits based on meritocracy and/or performance evaluation.

Pedregal always seeks to train and provide development opportunities to all its collaborators to enhance their knowledge and skills to perform well in their roles, as well as to acquire knowledge and skills that may prepare them to take on higher levels of responsibility according to their performance and potential. It is each individual's responsibility to develop, perform, and progress in their job.

Our commitment to society regarding the fight against human trafficking is a priority for all employees and for companies that engage in business exchanges with us.

No employee, supplier, or customer may commit the crime of human trafficking, as stipulated in the Peruvian Penal Code and various international regulations.

All employees must be familiar with the PO2-PRE-005 Policy Against Human Trafficking, and Pedregal employees are required to participate in the training sessions organized on this topic. Forced labor is strictly prohibited, which means any work or service performed involuntarily under threat of punishment, physical or otherwise.

It is Pedregal's policy not to employ minors, either directly or indirectly through subcontractors, nor to accept the employment of minors in contravention of national legislation.

Additionally, we do not engage in or use forced labor under any circumstances.


Pedregal complies with the minimum age requirement for employment on our premises, as stipulated by national laws or by the International Labour Organization (ILO) regarding the minimum age for employment, whichever is higher.

Child labor violates children's fundamental rights, including access to education, health, and protection against exploitation.

Pedregal's policy is to protect children from economic exploitation and from performing any forced labor that may be dangerous, impede access to education, or be harmful to their physical, mental, moral, or social development.

5.4. Ethical Line

For promoting a transparent organizational culture, Pedregal provides the ethical line with the following channel for a fluid communication:

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A. Website

- El Pedregal makes it easy to enter complaints directly on the website: www.lineaeticapedregal.com
- This page contains answers and guidelines for entering claims easily and practically.
- Available 24/7, the 365 days of the year.
- The report shall be answered by the ethical line's administrator.
- No username or password is required to enter.
- A single correlative number shall be registered for processing and following the report.

B. Electronic Mail

- This email shall permit you send your report through: lineaetica@elpedregalsa.com
- It is available for any moment you consider advisable.
- The message will be read by the Ethical line's administrator.

C. Cell Phone or WhatsApp

- If you desire to communicate with the ethical Line's administrator for guiding you in the process to make a report dial: 922403778.
- Also, you may send a report through WhatsApp by using messages, audios, photos and attached files.
- This channel is available in the business hour (7:00am to 4:00pm), office days (Monday to Friday).

D. Personal Interview

- If you desire to be personally attended for filing a complaint, you can go to:
 - Lima Headquarters: Jr. Monte Rey 355, Piso 6, Surco, Lima –Perú
 - Piura Headquarters: Fundo Terela S/N Caserío de Terela, Castilla
 - Ica Headquarters: Fundo Yaurilla S/N Yaurilla, Los Aquijes
 - Trujillo Headquarters: Calle24 de Junio Nro. S/N (S/N Pueblo Chiquitoy) Ascope, La Libertad.
- Ask for any member of the Committee mentioned in the Annex 02 of this Code for making an appointment.
- Available in office days, Monday to Friday, in business hours (7:00am to 4:00pm) or out of office, previous appointment.

5.5. Precisions and Recommendations

- If any employee is informed of a potential infringement or suspect of infringement of the code, it is obliged to report it through the ethical line's channels.
- Employees may report any worry or claim related with internal controls, spreading, frauds, bribery and business practices opposite to the code.
- Any person may file, confidentially and anonymously, a report without any kind of reprisals, through our channels of complaint of our ethical line.

A. Handling of Reports

After receiving a report or complaint, through any of our Ethics Line reporting channels, the President of the Committee will acknowledge receipt of the report to the person who presented it.

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The complaint will then be reviewed by the President of the Committee for processing. Confidentiality will be maintained throughout the investigation process.

If the complainant does not identify himself in his complaint and the information provided is not sufficient, Pedregal must investigate the incident to resolve it.

Anonymous complaints must contain sufficient detail and information so that the investigation can be carried out.

The Committee will take appropriate and immediately applicable corrective actions that may apply. Likewise, when possible and considered appropriate by the Committee, the person who filed the complaint will receive notice of any corrective action taken.

B. Without Reprisals

Any member of Pedregal found responsible for retaliating against someone who has, in good faith, raised a concern, complaint, or report will be subject to disciplinary action, which may include termination of employment or the end of any other business relationship.

If anyone believes they have been subjected to such retaliation, they are encouraged to report it to the President or any member of the Committee.

C. Transparency in Relationship and the Right to Disagree

- Each of the members of Pedregal is obliged to interact in a positive way, meaning the absence of ulterior motives, manipulation of information or people, and induction into error. Good faith will govern Pedregal's relations with employees, shareholders, directors, clients, suppliers, the State and competitors.
- The controversy in Pedregal is welcomed and respected. The members of this company can express their disagreements with actions that they consider contrary to their principles of equity, human dignity and their ideas. But their obligation must always be the responsible, mature, prudent and respectful manifestation.
- At Pedregal we guarantee equal treatment in the face of discrepancies, without considering differences in religion, race, creed, political affiliation and ways of thinking, feeling or acting.

D. Knowledge Statement

- Every employee must read this document and comply with its guidelines, in addition to reporting any infringement, suspected or real, that he or she has noticed.
- All infringement to the guidelines established in this code shall origin disciplinary measures which could include since a warning until the extinction of the relation with Pedregal. Even, Pedregal may be obliged to report supervising authorities above several types of infractions, in such case the employee could be subjected to administrative, legal or judicial penalties established in the legislation in force.

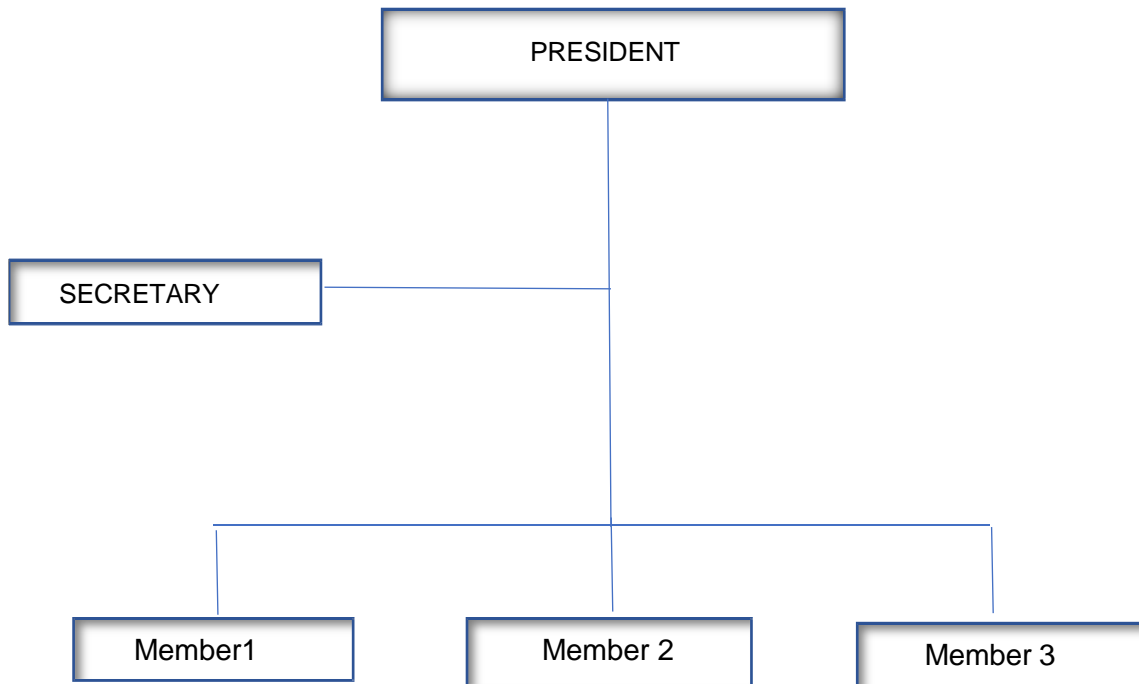
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6. ANNEXES

N°	TITULO
01	Organizational Chart of the Committee.
02	Committee Members.

ANNEX 01

ORGANIZATIONAL CHART OF THE COMMITTEE



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ANNEX 02

COMMITTEE MEMBERS

Member's Name	Positions	Office
Carolina Jones	Prevention Manager	Lima
Gerardo Cajo	Lawyer	Ica
Edwin Rebolledo	Deputy Manager of Human Resources	Piura
Denisse Samanez	Lawyer	Piura
Marleny Ojeda	Head of Strategic Compensation Management	Lima
Omar Aquino	Deputy Manager of Accounting	Lima
Alessandra Ahumada	Deputy Manager of Labor Relations	Lima
Manuel Ríos	Deputy Manager of Human Resources	Ica
Nélida Zevallos	Head of Logistics	Trujillo
Yolanda Gálvez	Head of Administration and Processes	Lima
Miguel Mendoza	Manager of Management Control and Budgeting	Lima
Massimo Farro	SAP Supervisor	Lima
Mishell Hernani	Deputy Legal Manager	Lima