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1. INTRODUCTION

Our Purpose

At Inkia Energy, we have a strong purpose that we put into practice every day: To provide innovative and sustainable energy solutions to develop every home, company, city and country.

We are proud to say that: We are the energy that makes the world goes round.

This commits us to contribute to the growth of our customers and the development of our communities, something we must achieve by acting in the right way, according to our Cultural Principles and the highest ethical standards.

Our Cultural Principles

This Code of Conduct is based on our Principles. They include:

- Every partner counts

We are aware of the dimension of our decisions. Therefore, we make them knowing and understanding the needs of the environment and the impact they will have on each of our stakeholders: **customers, shareholders, communities, government institutions and suppliers.**

- Focused on creating value

We can always do more and better. We create value through growth, innovation and efficiency.

- Ethics drives our actions

We act with **transparency, honesty and respect.**

- We encourage change

We are always looking for new ideas aligned with our purpose. We challenge ourselves and **are not satisfied with the status quo.**

- We are an empowered and responsible team

We empower our employees.

We are committed and own our tasks and responsibilities.

So that for the world to go round, I do the right thing.

Our Commitment

We are committed to building trust and providing safety to all those with whom we interact in the course of our business.

To achieve this, we must be transparent and authentic in our interactions with our employees, business partners, shareholders, the communities we serve, and the governmental agencies that regulate and supervise our activities.

We accept personal responsibility to act in a thorough, ethical and transparent manner; complying with the law in every activity we undertake and respecting the jurisdiction in which we operate.

At Inkia Energy we must always seek to act with the utmost personal and professional integrity; promoting a true culture of compliance and operational excellence. We will keep a watchful eye on transparency and ethics. We do not allow the pressure for results to compromise in any way our performance.

Our Code of Conduct sets forth expectations about our commitment in the company and to all our stakeholders. If you have any questions or concerns, you can contact your direct supervisor or any member of the management team, Human Resources, Ethics and Compliance, either directly or indirectly through our Ethics Hotline. We ensure absolute confidentiality and protection against any form of intimidation or retaliation.

We invite you to live our culture of compliance on a daily basis and to show that at Inkia Energy, Ethics is always the driver of our actions.

2. MAKING THE RIGHT DECISION

Integrity is fundamental to our group. We do the right thing so that the world never stands still.

By acting with integrity, we build positively the reputation of the companies of our Group in all the countries where we operate.

Although we generally know the difference between right and wrong, sometimes problems do not have a clear solution. Regardless of the situation, all of us are expected to show good judgment when making decisions and acting on behalf of the companies of Inkia Energy Group.

You could find yourself in a situation not addressed in this Code; a regulation, law or group policy that raises doubts about what the right thing to do is. Each of us must take over personal responsibility for our own proper performance and uphold high ethical standards.

If during the course of your activities you face a difficult decision that raises doubts or questions, ask yourself the following questions:

To seek for guidance or report an actual or suspected violation, contact:

1. Is it aligned with our Purpose and Principles?
2. Does it go against my responsibilities as an Employee?

3. Does it violate the Group's Code of Conduct, a policy or a law?
4. Could it damage my reputation or the company's goodwill?
5. How would I feel if it became public knowledge, disclosed in the media or on social networks?
6. How would I feel if my decision put at risk the physical integrity, the company's assets or people?

If you find it difficult to answer any of these questions, or the answer does not satisfy you, seek for advice or report your concerns to your direct supervisor or any member of the management team, Human Resources, Legal, or the Compliance and Litigation area; either by direct communication or through our Ethics Hotline.

3. SEEKING FOR GUIDANCE AND REPORTING CONCERNS

As a member of the Inkia Energy team, we are responsible for reporting any actual or suspected violations of the Code of Conduct, Policies or Procedures and for seeking explanation and guidance on ethics, compliance and legal issues.

To seek for guidance or report an actual or suspected violation, contact:

1. Your direct supervisor.
2. Inkia Energy Group management team.
3. Human Resources Area.
4. Legal Area.
5. Ethics and Compliance Area.
6. Ethics Hotline.

4. ETHICS HOTLINE

In order to know, consult, report and denounce any concerns regarding this Code of Conduct, the Group's Policies or Procedures or the related legal framework, Inkia Energy has an Ethics Hotline that can be accessed by people inside and outside the Group.

Impartial and transparent. The Hotline guarantees confidentiality of information, preserving the identity of the persons involved, if they prefer.

This Ethics Hotline may be also used to clarify doubts of interpretation and file complaints of potential non-compliance with the Code of Conduct, Corporate Policies and Procedures and regulations, in general, in areas such as: corruption, bribery, fraud, money laundering, attacks to environment, alteration of accounting records, misuse of Group assets, discrimination, unethical behavior, among others.

Access the Ethics Hotline through the following channels:

- By e-mail: Compliance.Officer@InkiaEnergy.com
- In the Ethics Line site: inkiaenergy.ethicspoint.com
- By telephone: To the numbers listed in the table below:

COUNTRY	ETHICS HOTLINE
UNITED STATES OF AMERICA	Direct access: From an external line, dial: 1-844-222-1729.
ARGENTINA	International Toll Free Service (ITFS) From an external line, dial the ITFS number: 0800-444-8759
BOLIVIA	International Toll-Free Telephone Service (ITFS) From an external line, dial the ITFS number: 800-11-0365
CHILE	Direct access: From an external line, dial the number corresponding to your carrier: Telmex: 800-225-288 Telefonica: 800-800-288 Entel: 800-360-311 Entel - operator in Spanish: 800-360-312 For English, dial: 844-222-1729
COLOMBIA	Direct access: From an external line, dial: 01-800-911-0010 For English, dial: 844-222-1729. From an external line, dial 01-800-911-0011 (Spanish operator).
EL SALVADOR	Direct access: From an external line, dial: 800-1785 (Spanish Operator) For English, dial: 844-222-1729.
GUATEMALA	Direct access: From an external line, dial: 999-9190 (Claro) For English, dial: 844-222-1729
MEXICO	International Toll Free Service (ITFS) From an external line, dial the ITFS number: 001-844-451-8777
NICARAGUA	Direct access: From an external line, dial: 1-800-0164 For English, dial: 844-222-1729.
PANAMA	Direct access: From an external line, dial: 800-2288 For English, dial: 844-222-1729.
PERU	Direct access: From an external line, dial: 0-800-50-000 For English, dial: 844-222-1729.
THE DOMINICAN REPUBLIC	Direct access: From an external line, dial: 1-800-0164 For English, dial: 844-222-1729.
NICARAGUA	Direct access: From an external line, dial: 1-800-0164 For English, dial: 844-222-1729.

5. REPORTING IN GOOD FAITH AND OUR CORPORATE ANTI-RETALIATION POLICY

Inkia Energy encourages reporting and whistleblowing in good faith to enhance awareness of our compliance culture.

We do not tolerate any retaliation against employees who in good faith report concerns or those who assist or participate in the investigation or resolution of concerns.

Good faith means that you honestly believe that your concern is legitimate, even if you are not entirely certain that it is. Knowingly making a false accusation is a violation of this Code.

Appropriate corrective actions will be taken against employees who promote or engage in any retaliation. If you believe you have been retaliated against, contact any contact person or channel listed in the "Seeking for Guidance and Reporting Concerns" section of this Code.

6. DISCIPLINARY ACTIONS

The existence of standards, policies and procedures is an essential condition for our success. We are all responsible for their compliance in order to achieve an efficient and smooth operation of our organization.

Any deviation or non-compliance may result in a disciplinary action, which, if applied, will serve as a corrective measure.

It is the responsibility of all Employees to be familiar with this Code, company policies and standards, and to seek for orientation when in doubt.

It is the responsibility of each supervisor, manager or team leader to inform, guide and prepare their team for the correct application of the rules of the organization, and become an example to follow.

Disciplinary measures should be applied, as far as possible, immediately after the offense is committed. These must be fair, reasonable and proportional to the offense committed, always respecting the legal framework of each jurisdiction and the internal rules of the company involved.

7. BUILDING MUTUAL TRUST: FAIR TREATMENT OF OUR EMPLOYEES

We undertake to create and keep an inclusive work environment in which the contributions of each individual are recognized. All people are valued, respected and given equal opportunities to reach their full potential.

We do not tolerate discrimination, harassment or retaliation in the workplace. In other words, everything we do is driven by a positive and inclusive spirit.

EQUAL EMPLOYMENT OPPORTUNITIES

Inkia Energy offers equal employment opportunities to all and does not tolerate any discrimination or prejudice whether based on race, religion, age, gender, ethnicity, political beliefs, nationality, marital status, sexual orientation, physical condition or any other.

In the recruitment, selection and promotion processes, we evaluate candidates based on their skills and performance.

It is forbidden to recruit first or second-degree relatives and spouses in positions where there is a direct or indirect hierarchical relationship, or which are subordinate to the same immediate superior.

HARASSMENT-FREE WORKPLACE

Inkia Energy undertakes to create and maintain a culture where all employees can begin each day with a sense of purpose and end each day with a sense of accomplishment.

We do not tolerate any type of harassment, including: sexual, economic, moral or any other harassment. We condemn any disrespect, intimidation or threats in the relationship among employees, regardless of their hierarchical order.

When any situation occurs in the workplace that makes you or others feel uncomfortable, or that violates your dignity, report it immediately to any of the contact person or channel listed in the "Seeking for Guidance and Reporting Concerns" section of this Code.

VIOLENCE-FREE WORKPLACE

Inkia Energy is committed to providing a safe and secure workplace with zero tolerance for violent incidents committed by or against employees, temporary workers, suppliers, customers or visitors.

Violent conduct of any kind is prohibited. This includes: threats, physical abuse, harassment, vandalism, arson, sabotage, etc.

Employees must behave in a safe and respectful manner on the premises of the Group's companies and at any time they are attending to Group business, regardless of their location.

WEAPONS

Our commitment to a violence-free workplace also includes zero tolerance for the possession of weapons on Group company premises.

Employees are forbidden from carrying weapons (including components that could be assembled into a weapon) inside Group company vehicles or facilities or while on work-related business, except for professionals specifically authorized by the company in accordance with their responsibilities.

ALCOHOL AND DRUG FREE WORKPLACE

We have a mutual obligation to work under safe conditions so that we can depend on each other for the fulfillment of our objectives.

It is forbidden to drink alcoholic beverages on the premises of the Group's companies or during working hours, as well as to perform your duties while intoxicated.

It is also forbidden to use or possess drugs or to remain in an altered state due to the use of drugs on the Group's premises.

BEHAVIOR OUTSIDE THE WORK ENVIRONMENT

Our behavior outside the workplace could adversely affect our Group and project a negative image of how reliable we are.

As members of the Inkia Energy Group, we must show good judgement in public environments, whether in professional circumstances or in our private life, acting with prudence and care, without jeopardizing the goodwill of the Group's companies or our personal reputation.

Whether in an internal or external environment, when participating in events or engagements, using Group assets or in other situations that allow Inkia Energy to be identified as an employer, our behavior must be consistent with our Principles, thus contributing to the recognition of the good image of our Group.

HEALTH AND SAFETY

At Inkia Energy we put safety first in everything we do. Our goals are: the elimination of risks that may cause incidents or accidents and the promotion of a culture of safety and protection against occupational diseases.

We promote a culture in which Inkia Energy employees and subcontractors show their personal commitment to the continuous improvement of safety internally and in the areas of influence where we operate. Protecting our people improves the quality of life of our staff and contributes to our long-term business success.

Each of us must be committed to preventing occupational health and safety hazards and risks. Only through the participation, identification and commitment of each of us can all Group companies achieve injury-free and occupational disease-free workplaces.

We set clear expectations, provide support, assistance, training and hold ourselves accountable for understanding and incorporating health and safety prevention measures into our daily tasks.

CONFLICT OF INTEREST

As employees of Inkia Energy, we have a responsibility to be loyal to our company and to avoid actual or potential conflicts of interest.

Conflicts of interest arise when:

- An employee's personal interest may be contrary to the interest of the group's companies.

- When personal judgment could be or be perceived to be influenced in their ability to make objective decisions or in the thorough fulfillment of their responsibilities.
- When an employee uses his or her influence or acts with the purpose of benefiting particular interests that may conflict with the interests of the group's companies or that may cause him or her harm.

In case of doubt, seek for orientation as recommended in the "Seeking for Guidance and Reporting Concerns" section of this Code.

In order to prevent or avoid conflicts of interest, consider the following recommendations and guidelines:

- Business relationships with family members and close friends may influence our decisions and may impair objectivity when making business decisions.
- No employee may engage in outside activities such as consulting, holding office or representation in organizations with conflicting interests or doing business with Inkia Energy.
- Having corporate links -either directly or through a spouse or immediate family members- with suppliers or competitors of Inkia Energy companies is not allowed, if the position the employee holds gives him/her the power to influence transactions or gives them access to privileged information.
- Avoid supervising or taking part in the hiring or promotion of a family member, as well as holding a position in which you have access to or can influence performance evaluations, salary information or other confidential information related to a family member.
- The best way to reduce or eliminate a conflict and avoid a misunderstanding is to disclose any situation that has the potential to be misinterpreted by others.

Failure to communicate a potential conflict of interest is a violation of the Code.

PRIVILEGED INFORMATION

The use, dissemination or transfer of strategic information, whether confidential or even if not publicly disclosed, about Inkia Energy, its shareholders, affiliates or subsidiaries is strictly prohibited.

The information to which we have access in the course of our responsibilities is critical to our success and to the protection of the assets we operate. It is also an essential component of our corporate value and brand identity. We all have an obligation to safeguard confidential and strategic information and to protect it from inadvertent disclosure and from internal or external threats.

In addition, we are committed to protecting the personal information of our employees, customers, suppliers and shareholders.

Employees with access to confidential information must protect it from intentional or accidental disclosure. We must carefully restrict physical and electronic access to confidential information and only share it with others who are duly authorized due to of their function or position.

PERSONAL INVESTMENT DECISIONS

As an Inkia Energy employee, you may be subject to rules that prevent you from engaging in certain types of transactions related to the purchase or sale of any securities that Inkia Energy may issue.

Before trading in any such stock or security, you should consider whether you have access to material non-public information regarding Inkia Energy or any other company with which we do business that could affect an investor's reasonable decision to enter into a transaction or could give rise to a legal default.

8. BUILDING MUTUAL TRUST: OUR BUSINESS PARTNERS AND STAKEHOLDERS

Inkia Energy builds relationships based on trust and respect with all its customers, investors, suppliers, government, communities and other stakeholders. To earn and preserve that trust, we conduct our business with transparency, legality and integrity.

We do not engage in unfair or corrupt business practices and have zero tolerance for bribery.

OUR SUPPLIERS

Our suppliers and vendors are an integral part to our Group's success; therefore, we select them very careful. Our decision to select a supplier is based on fair and objective criteria, such as technical, commercial or other valid business reasons.

In addition, we expect our suppliers of goods and services to share and adhere to our core values and internal standards and to apply them to the way they do business.

GIFTS AND BUSINESS COURTESIES

Business courtesies are designed to build goodwill and strong working relationships between business partners, but should never be used to gain a special advantage in a relationship. Although a modest exchange may be acceptable, under certain conditions, you are never required to do business with Inkia Energy and should never give business courtesies or gifts of any kind that could reasonably be perceived as improperly influencing a business decision or creating a business obligation on the part of the recipient. Refer to the Gifts and Business Courtesies Policy for further information and recommendations on this topic.

Acceptance of gifts and business courtesies is prohibited. Exceptions to this provision are set forth in the Gift and Business Courtesies Policy.

FAIR COMPETITION

At Inkia Energy we believe in doing business in an honest and transparent manner. We will always participate in the marketplace in a fair and legal manner. We prohibit activities that reduce competition and restrict trade, such as price-fixing agreements, bid rigging, monopoly or division of market territories.

We will not engage in any activity that disrespects our competitors or make inaccurate statements about their products or services or ours. See the Corporate Antitrust Compliance Policy for more information and recommendations on this topic.

FRAUD PREVENTION

Employees who intentionally misrepresent or conceal facts or documents relating to our business, or who assist others in doing so, have committed fraud.

Fraud affects the integrity of our financial reporting, the safety of our assets and the integrity of our business. If you are aware of or suspect fraud, you should promptly disclose and report it through the channels listed in the "Seeking for Orientation and Reporting Concerns" section of this Code.

BUILDING TRUST WITH THE GOVERNMENT

Inkia Energy respects the laws and authorities of all levels of government in all countries where we do business.

Our operations are subject to numerous laws, rules and regulations. Violations of these rules - deliberately or unintentionally - can affect the Group's operations, financial stability and goodwill.

For this reason, we must all understand and comply with the wording and spirit of the laws, regulations and standards applicable to the work or function we perform, as well as the acts and contracts we enter into on behalf of Group companies.

We are also committed to cooperating with and responding appropriately to government inquiries or investigations, as required. Before submitting any request for information, contact the Legal or Ethics and Compliance area for orientation.

INTERACTION WITH PUBLIC OFFICIALS

Inkia Energy regularly interacts with public officials responsible for the laws, regulations, rules, policies and supervision applicable to our Group's operations.

Public officials include any representative of government, government agencies, governmental bodies and also include elected or appointed officials in foreign, federal, state and local governments, regulatory commissions and other oversight bodies, as well as candidates for public office.

We must treat union leaders and representatives as public officials regardless of whether they are considered as such under the laws of the relevant jurisdiction.

We must ensure that our interactions and relationships with public officials are professional, productive and comply with all related laws, mandates, regulations and standards. For more information on this topic, see the Interaction with Public Officials Policy.

BRIBERY AND CORRUPTION

A bribe is the giving or offering of something, irrespective of its value, to someone in order to influence a decision. We take a firm stance against corruption, consistent with our principles and the existing regulatory framework.

We will not tolerate any kind of corrupt activity, nor will we tolerate such activity committed by a third party on our behalf. This means that we will not pay, give or offer bribes, directly or indirectly, to illegally influence business decisions, obtain advantages or reward another party for illegal actions.

We comply with internationally applicable anti-corruption laws such as the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act (UKBA), among others, as well as with the local anti-corruption, anti-bribery and general crime prevention regulations of the countries where we operate.

We do not offer or accept bribes, illegal gratuities or similar payments. We will never punish an employee for refusing to pay a bribe, even if it results in the loss of business. In addition, our prohibition on corrupt payments and activities includes bribes or facilitation payments offered or made to private-sector individuals or to local or foreign government officials.

For more information on this topic, see the Anti-Corruption and Anti-Bribery Policy.

ENTERTAINMENT TRAVEL AND GIFTS TO PUBLIC OFFICIALS

Entertainment travel and gifts to public officials are prohibited. Any exceptions to this provision is duly set forth in the Policy on Interactions with Public Officials and Gifts and Business Courtesies.

PARTICIPATION IN POLITICAL PROCESSES

No employee may make, on behalf of Inkia Energy, any contribution in money, goods or services, regardless of their value, to political campaigns or any cause whatsoever.

Inkia Energy respects each employee's individual right to engage in civic affairs and participate in political processes. However, such participation must be done in their own time and with their own means.

The use of resources, assets, facilities and image of the Group's companies to serve any personal or partisan political interests is forbidden.

ANSWERING TO REQUESTS FOR INFORMATION

We are committed to providing complete, accurate and truthful information when responding to requests for information related to our business.

Various government agencies or entities may also request information and documents from Inkia Energy.

Both an understanding of the issues raised by these requests and the prompt involvement of appropriate Inkia Energy professionals are necessary to comply with the law, ensure proper protection of Inkia Energy's rights, the rights of its employees and to provide accurate and consistent responses to such requests.

If you receive a request for information, please contact the Legal Department for guidance.

BUILDING TRUST WITH OUR COMMUNITIES

Inkia Energy respects and contributes to the development of the communities within the area of influence of its operations, protecting our environment, using its assets prudently, safeguarding sensitive information in our possession and communicating honestly and transparently about our activities.

We recognize the impact we have locally, nationally and globally. We regularly work with diverse stakeholders to improve the quality of life in these communities.

PRESERVING OUR ENVIRONMENT

We are committed to being good neighbors, which means that we respect and honor our role as stewards of our environment. Sustainability is essential to everything we do, and responsible management of our natural resources is critical to a clean environment, to the quality of life in the communities surrounding our operations, and to Inkia Energy's long-term business success.

All of us must demonstrate a personal commitment to protecting environment.

We strive to be leaders in the transition to cleaner, more efficient energy solutions in order to reduce our carbon emissions and other impacts on the environment.

9. FINANCIAL INTEGRITY, SAFEGUARDING OUR ASSETS AND TRANSPARENCY

We must keep complete and accurate financial records that accurately reflect the condition and performance of the Group's companies, and we must protect the property, assets, and confidential information of the Group's companies.

ACCURATE BOOKS AND RECORDS

Regardless of our position, we have an obligation to ensure that the information we provide for operational, business, financial, and other records is complete, timely, and objective. Whenever a record is created, we must ensure that all information is included and accurate.

GROUP ASSETS

We rely on the assets of our companies to support our daily work. We are entrusted with property, equipment, assets and facilities to be used exclusively for the lawful and proper purposes of our operations and in the conduct of our business. Their use for private purposes is prohibited.

It is the responsibility of each employee to ensure the proper use and conservation of the Group's assets under his or her use or custody.

USE OF ELECTRONIC INFORMATION SYSTEMS

Electronic systems and computer resources are at the disposal of our Group's employees for the proper performance of their duties.

Their use is permitted for personal matters, provided that they do not contradict internal rules and policies, and do not interfere with the performance of work.

The exchange, downloading, storage or use of obscene, pornographic, violent, violent, discriminatory, racist, defamatory, disrespectful to any individual or entity, or contrary to the policies and interests of Inkia Energy is prohibited. Games and chain letters are also not allowed.

No software or program should be copied or installed on the company's computers or mobile devices without prior authorization from the Information Technology area.

Users of the Company's electronic systems and computer resources should have no expectation of privacy in their use. Inkia Energy may use and track any information transmitted or stored on these media.

INTELLECTUAL PROPERTY

Intellectual property is a creation or innovation used in business and constitutes an irreplaceable asset. We all have a responsibility to protect our intellectual property and respect the intellectual property of others. We must abide by all laws and regulations relating to intellectual property, copyrights, patents, trademarks and trade/trade secrets. Any suspected misappropriation of intellectual property, unauthorized disclosure of intellectual property or access to our group's information should be reported immediately to any contact or channel indicated in the "Seeking for Orientation and Reporting Concerns" section.

RELATIONS WITH THE MEDIA

Inkia Energy is committed to communicating with the public in a truthful, consistent and transparent manner. Contact with the press or the media shall be made exclusively by the spokespersons designated in each Group company. It is therefore forbidden to make contact and disseminate information to the media on behalf of Inkia Energy.

Employees must not use social networks to disseminate unauthorized information about Group companies, nor to express opinions on behalf of the Group.

THE INKIA ENERGY BRAND AND REPUTATION

Our brand and reputation are some of our most valuable assets. Misuse or loss of these assets could have a serious financial, reputational or image impact.

We must take steps to ensure the integrity of our brand and live up to the reputation for excellence it represents.

LAWS AND REGULATIONS APPLICABLE TO THE GROUP COMPANIES

Each of us contributes to the reputation of our companies as a fully aware and law-abiding citizen. We rely on each other to ensure that we comply with the legal and regulatory requirements imposed by the various bodies that govern our industry and protect the public interest.

Our policies and procedures are deployed to prevent, detect and respond to potential violations of laws, rules and regulations that apply to Inkia Energy's operations. Individually, we are responsible for understanding the laws, regulations and standards applicable to our performance and the consequences of our actions. Intentional non-compliance is not acceptable.

CHANGE CONTROL			
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1	07/Jan/2019	Initial document	Maria Vera & Romulo Yarleque
2	20/Aug/2019	Adjustments to the new culture	Maria Vera
3	11/Nov/2019	English adaptation	External Translator