

Version	Effective Date	Prepared by:	Reviewed by:	Approved by:
4	04/22/19	Ximena Corbetto and Romulo Yarleque	Maria Vera, Ximena Corbetto, Evangelina Vidal, Gloria Molinedo, Mario Lopez and Nancy Zentina	Maria Vera

This document is owned by Inkia Energy. It may not be transferred totally or partially to other parties without the prior written consent by Inkia Energy.

1. PURPOSE

It is Inkia Energy's policy to establish guidelines and recommendations for maintaining professional and productive relationships with Public Officials and to comply with all applicable laws, rules, regulations and mandates governing such relationships in each of the jurisdictions in which it operates.

All Inkia Energy Employees, or any third party acting on their behalf, interest or representation, who have dealings with Public Officials while performing any activity for the company, are responsible for knowing and complying with the provisions and guidelines set forth in this Policy.

This Policy will be read together with the corresponding sections of the Code of Conduct, the Anti-Corruption and Anti-Bribery Policy, the Conflict of Interest Policy, the Commercial Courtesies Policy and the Donations Policy.

2. SCOPE AND APPLICATION

Inkia Energy group companies are required to implement and comply with all applicable policies and guidelines.

Likewise, the Suppliers of the group companies are required to maintain the same spirit and intent of such policies and guidelines, by approving the provisions applicable to them according to the type of their contract.

3. DEFINITIONS

Merchandising items	A set of advertising or promotional products or items (usually including the logo or brand) that have a low or irrelevant nominal or resale value in the marketplace and are used to promote or advertise a product or brand.
Employee	It includes directors, managers, officers or employees who are part of Inkia Energy or any of its subsidiaries.

Conflict of Interests	A situation where business, financial, family, political or personal interests could interfere with the Employees' judgment in the performance of their duties towards the company.
True Conflict of Interest	When a Conflict of Interest occurs.
Potential Conflict of Interest	When an Employee has personal interests or situations that may, in the future, give rise to a true conflict of interest.
Apparent Conflict of Interest	It seems that an Employee's personal interests may unduly influence his/her decision. Even if this is not the case, it may cause misperceptions or suspicions, damaging his/her image.
Political Contribution	Any direct or indirect contribution or financing to local or foreign political parties, already established or in the process of creation, candidates to public positions, consultants or officials in public or intermediary institutions, aimed at raising funding for regular electoral campaigns.
Business Courtesies	Gift or privilege personally provided to third parties in order to start or foster a business, commercial or professional relationship. This includes, but is not limited to, events, meals, business meetings, trainings, conferences, travel or others at which the host is present.
Anything irrespective of its value	It includes cash, cash equivalents (such as gift certificates, vouchers), loans, gifts, travel, entertainment, political contributions, donations, offers of employment, business arrangements, favorable conditions for obtaining a good or service.
Donation	Dispose of funds or provide goods or services at no charge to meet requirements or endorse beneficial causes, in the benefit of a social cause, in the public interest, in the direct benefit of a group or community, or as an act of good will on behalf of Inkia Energy. Even though they are usually short term and specific oriented, these investments facilitate the perception of the company as an entity aware of local needs.
Public Officials	<p>A person holding a legislative, administrative or judicial office, by appointment, election or as successor, or any person exercising a public function, including for a public agency or corporation, or any officer or agent of a local or international public organization, or any candidate for public office.</p> <p>The word Public Official, governmental authority or elected or appointed government officials includes but is not limited to the following cases:</p>

	<ol style="list-style-type: none"> 1. Any officer, official or employee of any government entity, department or agency (whether foreign, national, federal, state, municipal, local or tribal) and of any branch or power of the state (executive, legislative or judicial). 2. Any officer or employee of regulatory commissions, supervisory bodies and/or any other institution or entity that exercises supervision over the company. 3. Any employee of a business, school, hospital or other state-owned or government-owned or government-owned entity. 4. Any political party or official, official spokesperson, officer, representative or employee thereof. 5. Any candidate for public office during the period of candidacy. 6. Officials, officers or employees of a public international organization or any body or agency thereof (e.g., the United Nations, the Olympic Committee, the FIFA Committee or the World Bank). 7. Any person acting in an official capacity or on behalf of a government entity. 8. Native communities, peasant communities or COCODES including their leaders, representatives or directors. 9. Union Leaders and Representatives should be treated as Public Officials regardless of whether they are considered as such by the laws of the corresponding jurisdiction.
Interest Management	<p>An activity by which individuals or legal entities promote their points of view and interests in the decision making process of Public Officials, with the purpose of orienting these decisions to the sense or objective desired by them.</p>
Interaction with Public Officials	<p>Interaction is understood as:</p> <ul style="list-style-type: none"> • A management that seeks as a result some action, decision or granting of rights (licenses, permits, authorizations or similar) by the Public Official. • An action where the Public Official requires or requests from the company the management or delivery of goods and services through the establishment of agreements or contracts. • An action where the company requires or requests from a Public Official the management or delivery of goods and services through the establishment of agreements or contracts. • An action in which matters of interest to both parties are addressed, negotiated or discussed. <p>Ex: Negotiation of tariffs, participation in activities, negotiation or working tables, participation in drafting laws or regulations.</p>

Facilitation Payments	Any unofficial and inappropriate payment made to a public official in order to obtain or expedite the performance of a routine or necessary action to which the public official is entitled.
Politically Exposed Person PEP	Individuals, national or foreign, who fulfill or who in the last five (5) years have fulfilled key public positions or important positions functions in an international organization, whether in national or foreign territory, and whose financial circumstances may be the object of public interest.
Suppliers	Persons and institutions with which the company has commercial, contractual or business ties and includes, in a broad sense, contractors, vendors of goods and/or services, consultants, subcontractors, advisors, agents, distributors, business partners, etc.
Positions Exposed to Risks of Compliance (PERC)	<p>A position in which an Employee meets at least one of the following criteria:</p> <ul style="list-style-type: none"> • Represents the company externally acting on its behalf, with authority to take commitments and make decisions. • Has the authority to make commitments on behalf of the company. <i>To take a commitments means entering into contracts, taking obligations, social commitments, commitments in kind, contributions).</i> • Authorizes contracting, supervises or administers activities with Business Partners. <i>To administer means authorizing, approving, negotiating or requesting services, payments or information relevant to the relationship with the Business Partner.</i> • Has decision-making power in the disposition, use and destination of resources, services, assets or money of the company. • Interacts with Public Officials. • Handles or has access to sensitive and/or confidential information of the Level 3 company as stipulated in the T - 05 Information Storage Policy. • Makes business trips to foreign countries on behalf of the company. <p>Note: Internal personnel who have a <u>Technical and/or Ordinary Relationship with Public Officials</u>, perform routine payments, procedures or formalities in public agencies and who do not have negotiating or decision-making power or the capacity to commit the company to agreements are not considered positions with High Exposure to Compliance Risks.</p>

<p>Judicial or Administrative Proceedings</p>	<p>A case or process (lawsuit) in which the company is a party (active, passive or third party), regardless of their type, whether criminal, civil, administrative, constitutional or other.</p>
<p>Technical and/or Ordinary Relationship with Public Officials</p>	<p>Relationship is understood as:</p> <ul style="list-style-type: none"> • Routine relationship such as technical coordination, maintenance, interruptions, etc. or in compliance with legal or regulatory provisions such as, delivery of reports, information, documentation, follow-up of files. • Routine coordination arising from the execution of contracts and agreements previously signed between the company and the Public Official. • Protocol participation such as attendance to public events as guests, inaugurations, presentation meetings of new officers, leaders or directors, etc. • Other relations or meetings that do not qualify as Interaction.
<p>Gift or Present</p>	<p>A thing that is given or received free of charge voluntarily or by custom. It may be goods or services that are given as a token of friendship, appreciation or to promote personal, business, commercial or professional relationships. Gifts or presents include, but are not limited to, promotional items, food baskets, consumer vouchers, tickets to sporting or cultural events, travel, any other item regardless of value, or non-pecuniary benefit, that is given to an individual or group of people where the host is not present.</p>
<p>Bribery</p>	<p>Any offer, promise, delivery, acceptance or request of an undue advantage irrespective of its value (financial or not), directly or indirectly, and irrespective of its location, in violation of the applicable law, as an incentive or reward for a person in relation to the performance of his/her obligations.</p>
<p>Business Partner</p>	<p>It includes, but is not limited to, customers, consumers, “business alliances”, business alliance partners, consortium members, suppliers, contractors, consultants, subcontractors, vendors, advisors, agents, distributors, representatives, intermediaries and investors.</p>

4. POLICY STATEMENT

Relations with Public Officials must be transparent, open, documented and executed within the legal framework in force.

An Interaction with Public Officials means any action by an Employee or any third party acting in the name, interest or representation of the company, with the purpose of obtaining any action or decision by a Public Official. Interactions may be face-to-face, online or telephone calls.

For example: the management of a permit or official authorization, the approval of a technical dossier, etc.

4.1. Prohibition of Bribery and Facilitation Payments

Neither Inkia Energy, nor any of its Employees or any third party acting on its behalf, interest or representation, will offer or promise Anything Regardless of its Value, make or authorize payments or Facilitation Payments to Public Officials, directly or indirectly, in order to win or retain business or to attempt to influence a decision.

Bribery generally includes (i) bribing Public Officials or employees of the other contracting party, their close relatives, friends or business partners or (ii) using intermediaries such as managers, agents, subcontractors, consultants or other third parties, to allocate payments to Public Officials or employees of the other contracting party, their close relatives, friends or business partners.

4.2 Conflicts of Interest in Relationships with Public Officials or PEPs

If, before, during or after an interaction with a Public Official or PEP it becomes apparent that a True, Potential or Apparent Conflict of Interest exists, this must be declared as soon as it is noticed by means of the Declaration of Conflict of Interest submitted as referred to in the Conflict of Interest Declaration Guideline.

4.3 Positions interacting with Public Officials

- Each OpCo will define the positions authorized to interact with Public Officials based on the functions and responsibilities of each position. The responsibility for this definition is the responsibility of the person in charge of each area, together with the Human Resources area and the area of Ethics and Compliance and with the approval of the OpCo CEO.
- For each position, the level of Public Official and the type of interaction or management that he/she is authorized to have must be established.
- All those interactions or actions that are not previously defined in the positions must be previously approved by the person in charge of the corresponding area and informed to the area responsible for litigation and compliance of the OpCo. This approval does not imply a change in the definition of the position.

4.4 Recommendations for the Development of Meetings with Public Officials

Previous phase:

Before holding a meeting or due diligence with one or more Public Officials on behalf of the company, the following recommendations should be taken into account:

- Request an appointment formally, preferably in writing and well in advance depending on the subject matter, indicating the reason for the meeting.
- If possible, inform the direct supervisor in advance.

- Prepare appropriately for the meeting. List the items to be discussed and establish the company's position.
- Verify if there is a Conflict of Interest.
- Identify the Public Official(s) who will participate in the meeting or proceeding.
- Try to be accompanied to the meeting. Having witnesses offers a backup of what happened at the meeting.
- Make an analysis of the situation and context. If you notice anything possibly illegal or irregular, consult your direct supervisor, Legal Area or Ethics and Compliance Area.

Execution phase:

In the meeting or diligence, the following must be taken into account:

- Do not promise or deliver anything that is not permitted.
- Do not promise anything for which you do not have the power of decision or prior approval.
- Refuse any irregular or unacceptable offer.
- Consult before accepting any proposal that you have doubts about or that may be irregular.
- Prepare minutes of the meeting or issue a subsequent report.

Subsequent phase:

After the meeting or due diligence is over, follow the recommendations below:

- Immediately report the outcome of the meeting or due diligence, this contributes to transparency.
- Report to your direct supervisor, legal or Ethics and Compliance area, if you identify any illegality, irregularity or if you have doubts about what was discussed or agreed during the meeting or due diligence.
- Issue the Interaction with Public Officials report. Each OpCo will determine the frequency based on the level of interactions with Public Officials in each of its operations. The report must be sent to the head of the corresponding area and to the head of the OpCo's ethics and compliance area no more frequently than quarterly.

4.5 Gifts to Public Officials

It is forbidden to directly or indirectly give Gifts, Presents or any kind of privilege, regardless of their value, to Public Officials, such as donations, free services, offers of positions or jobs and others.

Exceptions

The following are exceptions to this provision:

- Gifts and Donations in favor of a public entity.
- Information materials.
- Training duly supported and approved by the head of the public entity.
- Recognitions or awards of commemorative value or conferred in public events.

- Samples distributed for promotional purposes.
- Lunches, meals, cocktails and the like, of a reasonable value, which are customary or common practice in the development of institutional relations.
- Merchandising items

For all purposes the exceptions contained in this section must comply with the other provisions set forth in the Policy on Gifts and Business Courtesies.

4.6 Business Courtesies Involving Public Officials

Business courtesies, including meals, when they include Public Officials, must be approved in advance. In the event that due to logistics or circumstance, it is not possible to request prior approval, this must be requested as soon as possible.

For the approval of these Business Courtesies, the Employee must indicate in writing the date, place, reason, participants and the approximate value of the expense. The "two levels up" rule must be followed for approval. Each OpCo will establish the mechanisms for recording and evidencing the approvals or regularizations made within its internal procedures and controls.

In addition, all courtesies granted to a Public Official must comply with the provisions set forth in the Gifts and Business Courtesies Policy.

4.7 Permits, licenses, inspections, oversight and general procedures

The following rules must be complied with when obtaining permits or authorizations, inspection or supervision processes carried out by authorities, supervisory or regulatory agencies and the performance of any procedure in general before any Public Official:

- It is not allowed to deliver or offer anything irrespective of its value, directly or indirectly:
 - To facilitate or expedite a permit, license or general procedure.
 - To facilitate or benefit the company in any way in an inspection, supervision or similar process.
 - To obtain, retain or secure business or advantage for the company.
- Only officially established fees, tariffs or payments must be paid.
- For the hiring of a consultant, broker or agent acting on behalf of the company, the internal requirements established in the due diligence and hiring processes must be previously complied with.
- It is not permitted to use consultants, processing clerks or agents as intermediaries for irregular conduct.
- It is not allowed to request reimbursement of expenses for unofficial items or the use of petty cash for unauthorized expenses.
- It is not permitted to authorize "special fees" or fees without support.

4.8 Interest Management

- Interest management must be carried out in a transparent manner and in compliance with the legal rules of the corresponding jurisdiction.

- Only arguments that are related to the subject matter should be used.
- For hiring a manager, consultant, broker or agent acting on behalf of or representing the company, the internal requirements established in the due diligence and hiring processes must be previously complied with.
- It is not permitted to use managers, brokers or agents as intermediaries for irregular conduct.
- It is not allowed to request reimbursement of expenses for unofficial items or the use of petty cash for unauthorized expenses.
- It is not allowed to authorize "special fees" or fees without supporting documentation.

4.9 Management of Judicial and Administrative Proceedings

- The judicial or administrative defense of the company's interests must be carried out in a transparent manner and in compliance with the legal rules of the corresponding jurisdiction.
- Only arguments that are related to the process to be dealt with should be used.
- For the hiring of lawyers or law firms, the internal requirements established in the due diligence and hiring processes must be previously complied with.
- It is not permitted to request reimbursement of expenses for unofficial items or the use of petty cash for unauthorized expenses.
- It is not permitted to authorize "special fees" or fees without supporting documentation.

4.10 Donations

- Donations are prohibited:
 - In cash or equivalent.
 - In favor of persons, identities or organizations that perform or promote activities against the law or the company's culture.
 - In favor of individuals or Public Officials.
- It is not permitted to accept requests for Donations, nor to commit the company if the applicable policies and procedures are not respected.
- If in the course of a meeting a Public Official requests a Donation, it must be indicated that it must be processed in accordance with the applicable policies and procedures.

Any process involving a Donation must comply with all provisions contained in the Anti-Corruption and Anti-Bribery Policy and the Donations Policy.

4.11 Prohibition of Political Contributions and Participation in Political Processes

Neither Inkia Energy nor any Employee or third party acting on its behalf, interest or representation, may make any contribution, goods or services, regardless of their value, for political campaigns or causes. The company's resources, assets, facilities and image may not be used to serve personal or partisan political interests.

Inkia Energy respects the individual right of each Employee to engage in civic affairs and participate in the political process, however, such participation must be done on his or her own time and at his or her own expense.

5. RESPONSIBILITIES

Employees

- Know and comply with the provisions of this Policy, as well as the applicable rules in the relevant jurisdiction.
- Report any non compliance or violation of this policy.
- Submit a query in case of doubt or concern.
- Attend and complete any training scheduled.

Managers and Supervisors

- Disseminate this policy, clarify or ask about any doubt related to the policy.
- Raise Employees awareness on the content and compliance with this Policy and the applicable rules.
- Understand how the interactions with Public Officials may have an impact in the company's business.
- Record and document the approvals required by the Policy.
- Define with the Human Resources area of the OpCo and the Ethics and Compliance area the positions authorized to interact with Public Officials.

Legal Area

- Inform about the guidelines and recommendations established in the rules of each jurisdiction in relation to the Interaction with Public Officials, as the case may be.
- Inform and resolve queries about the legal framework applicable to this Policy.
- Refer and clarify any doubt or comment related to the legal framework applicable to this Policy.

Ethics and Compliance Area

Area responsible for the administration of this policy and in charge of:

- Updating its content when required.
- Communicating and disseminating updates, changes, exceptions and any other related matter.
- Referring and clarifying any doubt or comment on the Policy.
- Providing specific guidance on each situation or case that arises in application of the Policy.

6. CONTROL AND COMPLIANCE

Compliance with this Policy is mandatory. All Inkia Energy personnel must understand their role and responsibility in relation to this Policy.

Each OpCo must establish the following controls in its internal procedures:

- Report of Interaction with Public Officials that should include at least the information included in Annex 1 of this Policy.

- Register of Approval of Commercial Courtesies delivered to Public Officials.
- Annual report of Entities and Public Officials with which it interacts. It must include as minimum the Information in Annex 2 of this Policy.

7. CONSEQUENCES OF NON-COMPLIANCE

Deviations and non-compliance with this policy may result in disciplinary measures, which, if applied, will serve as an educational component of our organizational culture.

Disciplinary measures must be fair, reasonable and proportional to the offense committed, respecting the corresponding legal framework.

8. EXCEPTIONS

Any exceptions to this policy must be dealt with on a case-by-case basis and must be duly supported by the CEO of the OpCo, and approved by the BU CEO and the Corporate Director of Ethics and Compliance.

9. ANNEXES

Annex 1

[P – 05 – 01 Report of Interaction with Public Officials](#)

Annex 2

[P – 05 -02 Annual report of Interaction with Entities and Public Officials](#)

CHANGE CONTROL			
Edition	Date	Description	Updated by
1	04/22/2019	Initial document	Ximena Corbetto and Romulo Yarleque
2	11/11/2019	English adaptation	External translator
3	03/09/2020	Adjustments to wording and updating content	Ximena Corbetto
4	08/24/2020	Adjustments to wording and updating content and insertion of controls	Maria Vera, Ximena Corbetto, Evangelina Vidal, Gloria Mollinedo, Mario Lopez and Nancy Zetina
5	09/09/2020	Adjustment of definitions	Evangelina Vidal and Ximena Corbetto
6	07/15/2021	Updating of definitions	Ximena Corbetto and Evangelina Vidal
7	10/26/2021	English adaptation	Evangelina Vidal and Ximena Corbetto