

Version	Effective Date	Prepared by:	Reviewed by:	Approved by:
2	04/05/19	Romulo Yarleque	Maria Vera	Maria Vera

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1. INTRODUCTION

Inkia Energy undertakes to comply with the laws and regulations, safety and environmental care in its operations and areas of influence. Therefore, it promotes respect, ethics, integrity, compliance with human and labor rights, environmental protection and confidentiality.

The prestige of our company is based not only on our own conduct, but also on the conduct of those with whom we do business.

Inkia Energy recognizes that its suppliers, although independent organizations, are involved in its value chain. This is the reason why it promotes and encourages them to know and comply with its Code of Conduct and other corporate policies.

This Code of Conduct shows our commitment to cause positive changes in the environment where we operate and encourages our suppliers to comply with these principles. This is simultaneous with the obligation they have to act in accordance with the laws, rules and regulations applicable to their area of operation. That is why we encourage compliance with the premises of this Code, making them mandatory requirements for our suppliers.

The Code of Conduct of Suppliers does not create contractual rights or establish all legal requirements for doing business with or on behalf of Inkia Energy. Each supplier is responsible for knowing, understanding and complying with the applicable standards necessary to do business with Inkia Energy, as well as the requirements and conditions set forth in its contracts or business agreements.

2. STANDARDS OF CONDUCT FOR SUPPLIERS

2.1. INKIA ENERGY POLICIES

Code of Conduct

Suppliers are required to comply with the provisions of this Code, as well as Inkia Energy's Code of Conduct, and are responsible for distributing and training their personnel on the Code.

In addition, they must ensure that their employees comply with its provisions during the performance of the business or contractual relationship with Inkia Energy, or when they are in any of its facilities.

Policies, Procedures and Regulations

Inkia Energy has a set of Policies, Procedures and Guidelines that define its corporate governance.

Inkia will inform its Suppliers of the Policies, Procedures and guidelines, etc., applicable to a given contractual or business relationship. Suppliers must know and comply with these provisions in the performance of their contract or business relationship.

Likewise, Suppliers are responsible for training their personnel in the content and provisions of the Code, and ensuring their compliance.

2.2 ETHICS

We expect our Suppliers to act in an upright and ethical manner when conducting their business and fulfilling their obligations.

Ethical requirements include the following aspects:

Legal and Regulatory Compliance.

Suppliers must comply with the legal requirements applicable in the jurisdiction where they carry out their activities, avoiding any conduct that, even without violating the law, may damage the reputation of Inkia Energy or produce adverse consequences for Group companies or their environment.

Likewise, they must comply with the rules prohibiting bribery, inappropriate payments, corruption and other unfair business practices and ethical misconduct intended to obtain an inappropriate advantage. They must also comply with laws on labor, employment, equal opportunity, immigration, child labor, compulsory forced labor, working hours, wages and benefits, freedom of association and harassment-free work environments.

Conflict of Interest

A conflict of interest exists when the Supplier's particular desires conflict or interfere with the interests of Inkia Energy.

By way of example, a conflict may arise in relation to Suppliers when:

- The service or good to be contracted is owned, totally or partially, or is under the control of an employee of Inkia Energy or a member of his or her family.
- They have access to private and confidential information and, at the same time, provide goods or services to Inkia Energy's competitors.

Prior to entering into a contract or business agreement, Supplier must promptly disclose any potential conflict of interest to Inkia Energy for review. If any conflict of interest arises during the contractual or business relationship, it must be disclosed immediately upon becoming aware of it.

For further details see the Corporate Conflict of Interest Policy.

Anti-bribery and anti-corruption behavior and measures

Inkia Energy is committed to a zero-tolerance policy on bribery and corruption and has implemented programs, prevention systems and internal controls to ensure compliance with the U.S. Foreign Corrupt Practices Act (FCPA), United Kingdom Bribery Act (UKBA), similar laws contained in the Organization for Economic Cooperation and Development (OECD) Convention on Combating Bribery of Foreign Public Officials in International Business Transactions (OECD Anti-Bribery Convention), among other supra-national standards; as well as the anti-corruption, anti-bribery and anti-bribery laws and legal framework applicable in all countries where it does business.

The Supplier must keep, at all times, an ethical and respectful behavior; always complying with the aforementioned rules. This will enable it to establish legitimate and productive relationships with Inkia Energy, its own suppliers and other companies with which it has relationships. Supplier must act with honesty and integrity in all interactions and business relationships with public or private entities in any country in which they operate.

In this sense, the Supplier will set up the mechanisms that allow it to fight against all forms of corruption and bribery in the development of its activities.

This includes, but is not limited to

- Not to make, promise or offer, directly or indirectly, any payment in money, in kind or any other benefit, to any person, individual or legal entity, whether or not considered a Public Official.
 - o In order to obtain or maintain, unlawfully, business or other advantages.
 - o With the purpose of abusing its influence, real or apparent, to obtain from any public or private authority any business or other advantage,
 - o When it is known that all or part of the money or kind will be offered or delivered, directly or indirectly, to third parties for any of the purposes mentioned in the foregoing paragraphs.
- Not to make facilitation or expediting payments, consisting of the delivery of money or other thing of value, irrespective of the amount, in exchange for securing or expediting the course of a procedure or action before any judicial body, public administration or official agency.
- In particular, Supplier will not make, offer or accept any payment in cash, in kind or any other benefit from any individual or legal person for the purpose of obtaining or retaining any business or advantage for itself or any third party.

For further details, please see the Corporate Policies on Anti-Corruption and Anti-Bribery and Interaction with Public Officials.

Gifts and Business Courtesies

Whenever a gift is offered in the context of a business relationship, there is a risk that it may influence or appear to influence a business decision. Exchanging modest gifts

and courtesies may be acceptable under certain conditions, but is not a requirement for doing business with Inkia Energy.

Offering or giving Inkia Energy employees cash, gifts or business courtesies is prohibited, except for the cases listed below; provided they are reasonable in cost, frequency and amount:

- Merchandising items or delivered directly or public or corporate events.
- Training, public or corporate events whose invitation is officially extended to Inkia Energy.
- Luncheons, meals, cocktail parties and the like, which are customary or common practice in the development of business relationships.

For more details, see the Corporate Policy on Gifts and Business Courtesies.

Information Completeness and Confidentiality

The protection of our confidential information and that of our customers, the personal data of our employees, as well as confidential information and records essential for the fulfillment of accounting, legal and management obligations, is fundamental for the development of activities.

Therefore, Suppliers must:

- Keep, in accordance with applicable regulations, accurate, complete and understandable accounting, financial and legal records. Suppliers must also observe all applicable laws and contractual requirements when creating, keeping and disposing of records that relate to their business dealings with the company.
- Respect Inkia Energy's intellectual property, trade secrets and any other confidential information to which they have access. They may not use such information to serve their own or any third party's interests.
- Safeguard Inkia Energy's information that is used in the course of a business agreement or contract; which will be used only for legitimate business purposes and in the protection of Inkia Energy's interests.

Use of Assets

Suppliers are required to use Inkia Energy's resources responsibly. This use must be for legitimate business and contractual purposes only, ensuring that such resources are used by duly authorized persons and for the purposes intended in the established contractual or business relationship.

Inkia Energy's resources are understood to be the facilities, equipment, systems, technological assets, information, office and field tools and supplies owned or provided by Inkia Energy.

Suppliers may not use the name, logo, trademarks or any intellectual property of Inkia Energy, or its Group companies, without its express written consent.

Suppliers, their employees, subcontractors, etc. are also prohibited from using the Group's resources or facilities to request or distribute information or materials not associated with Inkia Energy's activities or business.

2.3. HUMAN AND LABOR RIGHTS

Inkia Energy commits to comply with internationally recognized laws and practices in the area of Human and Labor Rights, such as:

- The protection of the values upheld in the Universal Declaration of Human Rights (1948), together with the instruments that develop it, the International Convention on Civil and Political Rights (1976) and the International Convention on Economic, Social and Cultural Rights (1976).
- The ten principles set out in the United Nations Global Pact and the United Nations Guiding Principles on Business and Human Rights.
- The Organization for Economic Cooperation and Development Guidelines for Multinational Enterprises.
- Declaration on Fundamental Principles and Rights at Work contained in the eight fundamental conventions of the International Labor Organization (ILO), Convention concerning Freedom of Association and Protection of the Right to Organize (1948), Convention concerning the Right to Organize and Collective Bargaining (1949), Forced Labor Convention (1930), Abolition of Forced Labor Convention (1957), Minimum Age Convention (1973), Worst Forms of Child Labor Convention (1999), Equal Remuneration Convention (1951) and Discrimination Convention (1958).

Inkia Energy's Suppliers must respect and comply with these laws and practices in the conduct of their business activities:

Human Rights

Suppliers support and respect the protection of human rights as defined in the above-mentioned documents; and ensure that they do not violate them by action or omission. Likewise, Inkia Energy's Suppliers respect the rights of local and indigenous communities and the areas inhabited by these groups in the development of their activities.

Labor Laws and Working Conditions

Suppliers must comply with labor laws and regulations, respecting all the rights of their employees and those of their subcontractors in accordance with the laws of the country where they carry out their activities. They must keep labor practices consistent with the international standards described above. In addition, they must ensure that the working conditions and environment are consistent with applicable national and international labor standards.

Respect for People, Equal Opportunity and Non-Discrimination

Suppliers will respect the dignity, privacy and any other rights that their workers have, avoiding any conduct that intimidates or offends the rights of individuals. Therefore, they will not promote discrimination at work on the basis of race, age, gender, marital status, sexual orientation, nationality, social or ethnic origin, ideology or public opinion, religion, physical capacity, health status, pregnancy or any other personal, physical or social condition of their employees, enabling equal opportunities among them.

Likewise, Suppliers must reject any expression of violence, exploitation or sexual, physical, psychological or moral harassment, abuse of authority or mistreatment.

Child Labor and Forced Labor

Suppliers do not promote child labor.

Workers in their organization, and their subcontractors, must be above the minimum working age stipulated in the relevant jurisdiction.

Suppliers will ensure and monitor the non-existence of forced labor in their organization, defined as any work carried out under any threat or retaliation, for which the individual does not volunteer.

2.4. HEALTH, SAFETY AND ENVIRONMENT

Health and Safety

Safety is our priority. Our Suppliers must share a commitment to providing a safe and healthy workplace, exercising good judgment in their work decisions and applying safe work practices (including regulatory and contract-specific requirements and those of the relevant jurisdiction) to all of their activities; safeguarding their employees, contractors, customers and the local environment.

Suppliers must ensure that their employees and subcontractors performing activities, or being on Inkia Energy's premises, comply with the health and safety requirements of each facility. This includes: prohibition on the use and possession of alcohol or illegal drugs, restrictions on the use and carrying of weapons, etc.

In particular, when working on Inkia Energy's premises, the Supplier must be aware of and enforce its employees and subcontractors to comply with all of our Company's Health, Safety and Environmental regulations.

Environment

Inkia Energy is committed to the protection and preservation of environment. We are committed to complying with regulatory requirements, so we actively seek suppliers who share our vision of protecting the environment; conserving biodiversity and the sustainable use of natural resources.

Our suppliers are required to comply with all applicable environmental protection legislation, as well as Inkia Energy's applicable policies and procedures.

3. RESPONSIBILITY OF SUPPLIER AND COMPLIANCE WITH THE CODE

3.1 INKIA ENERGY POLICIES

Supplier Responsibility

Suppliers have the obligation to distribute and train all their employees, subcontractors or personnel working on their behalf on this Code of Conduct of Suppliers; as well as other applicable Inkia Energy Corporate Policies, Procedures and Guidelines.

Inspections

Inkia Energy reserves the right to conduct inspections, monitoring and audits, including visits to our Suppliers' facilities, to verify that their business operations meet the expectations outlined in this Code. Suppliers will be notified in advance and will be required to cooperate in the conduct of such inspections.

Non-compliance with the Supplier Code of Conduct

Non-compliance by Suppliers may have different consequences on the commercial or contractual relationship with Inkia Energy, depending on the seriousness of the non-compliance.

Reporting Non-Compliance

Suppliers, their employees and their subcontractors must report any suspected non-compliance with this Code or Inkia Energy's Corporate Policies by employees or suppliers. Reports may be made by:

- Notification to your Inkia Energy representative.
- Inkia Energy's Ethics Hotline at:
 - Web site (Ethics Point NAVEX): <https://inkia.ethicspoint.com/>
 - Telephone (NAVEX Operator) at the numbers listed below:

Country	Ethics Hotline Number
Argentina	0800-444-8759
Bolivia	800-11-0365
Chile	Telmex: 800 800-225-288
	Telefonica: 800-800-288
	Entel: 800-360-312
	When requested, dial: 844-222-1729
Colombia	01-800-911-0011



CORPORATE POLICY

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	When requested, dial: 844-222-1729
El Salvador	800-1785
	When requested, dial: 844-222-1729
United States	1-844-222-1729
Guatemala	Claro: 999-9190
	When requested, dial: 844-222-1729
Mexico	001-844-451-8777
Nicaragua	1-800-0164
	When requested, dial: 844-222-1729
Panama	800-2288
	When requested, dial: 844-222-1729
Peru	Telefonica: 0-800-50-000
	When requested, dial: 844-222-1729
The Dominican Republic	Request your local operator a collect call to the United States and dial the following number:
	503-495-2717

We encourage open discussion of any questions or concerns about this Code or our contractual and business relationships. Suppliers may bring their questions or concerns to the contacts listed above.

Acceptance by Supplier

The undersigned hereby state that:

- We have received, know the contents of, and agree to comply with and enforce Inkia Energy's Code of Conduct for Suppliers and Inkia Energy's Corporate Policies applicable to our contractual or business relationship. These provisions also apply to our employees and subcontractors.
- We know, understand and agree to comply with all applicable laws, regulations and requirements of the jurisdictions in which we operate or do business.

We will report to Inkia Energy any suspected violation of this Code, its Corporate Policies or regulations in general.

Company Name

Name of Authorized Legal Representative

Date and Place

CHANGE CONTROL			
Edition	Date	Description	Updated by
1	04/05/19	Initial Document	Maria Vera
2	08/22/19	Adjustments to new culture	Maria Vera
3	09/26/19	Adjustments to wording	Ximena Corbetto
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