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1. INTRODUCTION

The purpose of this Manual for Crime Prevention (hereinafter, "Prevention Manual") aims to ensure that the company has the tools, systems, protocols, procedures, processes, customs and other elements in general that are sufficient and appropriate to prevent, avoid and/or mitigate the commission and/or participation of the company in the crimes of (i) Money Laundering; (ii) Financing of Terrorism; and, (iii) Bribery, including General Active Bribery, Transnational Active Bribery, and Specific Active Bribery, (iv) Simple and Aggravated Collusion; and (v) Influence Peddling (hereinafter, "Offenses Included") and is integrated to the Crime Prevention Model (hereinafter, the Prevention Model).

The design and implementation of the Prevention Manual shows the Inkia Energy Group's commitment to prevent, avoid and/or mitigate the commission of and/or participation in any of the Offenses Included. It seeks to identify, quantify, monitor and control the risks of its own corporate purpose and seeks to adapt to situations not contemplated or considered at the date of approval establishing clear criteria of integrity, transparency and honesty.

It is important to add that the Prevention Manual was prepared with a focus on the timely identification of risks and the continuous improvement of the processes necessary to maintain a culture of corporate integrity.

2. SCOPE

The Prevention Manual is applicable to all companies that are part of the Inkia Energy Group, hereinafter referred to as the Company, and is mandatory for all Employees of these companies, including their directors, senior management, managers, workers in general and, where appropriate, any third party related or linked to the Company contractually or commercially.

The Company will adopt the relevant mechanisms so that its suppliers, customers and related third parties are aware of and comply with the Prevention Model and Manual.

3. DEFINITIONS

Notwithstanding the definitions provided for in other sections of this Prevention Manual, the capitalized terms used in this Report document will have the meaning indicated below for each one of them:

Item	Description
Customer	Any individual or legal person that has any type of contractual agreement(s) for the reception of products and/or services provided by the Company in exchange for any type of consideration for them.
Specific Active Bribery	It occurs when a person, in any form, offers, gives or promises a gift, advantage or benefit to a magistrate, prosecutor, expert, arbitrator, member of an administrative or analogous court in order to influence the decision of a matter within its jurisdiction.
General Active Bribery	It occurs when a person who, in any form, offers, gives or promises a public official or public worker a donation, promise, advantage or benefit to perform or omit acts in violation of their obligations; and, when a person, under any authority, offers, gives or promises a gift, advantage or benefit so that the public official or public servant performs or omits acts proper to his/her position or employment, without failing to fulfill his obligation.
Transnational Active Bribery	It occurs when a person, in any form, directly or indirectly offers, grants or promises to a public official or public worker of another State or official of a public international organization, a gift, promise, advantage or undue advantage for his own benefit or that of another person, in order that such public official or public worker performs or omits to perform acts proper to his office or employment, in violation of his obligations or in breach of his duty to obtain or retain a business or other undue advantage in the conduct of international economic or commercial activities.
Simple Collusion	When a public official or employee who, intervening directly or indirectly, by reason of his position, in any stage of the forms of procurement or public contracting of goods, works or services, concessions or any other operation in charge of the State, conspires with the interested parties to defraud the State.
Aggravated Collusion	Aggravated collusion is committed by any public official or public worker who, intervening directly or indirectly, by reason of his position, in the contracting and acquisition of goods, works or services, concessions or any operation in charge of the State, by means of agreement with the interested parties, defrauds the State of its assets.
Conflict of interest	A situation where the Employees' judgment, regarding the personal interests or the interest of legal entities related to

	such individual, is altered or influenced by the decisions and/or actions he/she should perform for the Company.
Knowing the Customer	Each activity performed by the Company's personnel and/or representatives to obtain, verify, monitor and update the information that reliably proves the identity of Company's customers.
Knowing the Supplier	Any activity carried out by an individual and/or legal entity recruited by the Company to obtain, verify, monitor and update the information that reliably proves the identity of Company's employees.
Knowing the Employee	Any activity performed by an individual and/or legal entity recruited by the Company to obtain, verify, monitor and update information that evidences truly the identity of the Company's suppliers.
Employee	It includes directors, managers, officers or employees who are part of Inkia Energy or any of its subsidiaries.
Due Diligence	Any and all activities carried out by Company to obtain, verify, monitor and update the information that reliably proves the identity of persons or companies related to Company, including: Employees, Clients, Suppliers and Stakeholders.
Contingency Degree	It means what is set forth in the eighth section of this Prevention Manual.
Report	A document described in section seventh of this Prevention Manual.
Professional Judgement	Characteristics of Company Employees covering the use of technical knowledge and professional experience to select decisions, controls or measures applicable to this Prevention Manual.
Money Laundering	This crime may be committed under any of the following three (03) forms: <ul style="list-style-type: none"> a. When a person who exchanges or transfers money, goods, properties or profits whose illicit origin he/she knows or should have presumed, with the purpose of avoiding the identification of its origin, its seizure or forfeiture; b. When a person acquires, uses, possesses, keeps, manages, administers, keeps custody of,

	<p>receives, conceals or maintains in his possession money, goods, properties or proceeds, which illicit origin he/she knows or should presume; or,</p> <p>A person who transports or moves with himself or by any means within the national territory cash or negotiable financial instruments issued "to the bearer" which illicit origin he/she knows or should presume, in order to avoid the identification of its origin, its seizure or confiscation; or causes such goods, whose illicit origin he/she knows or presumes to enter or leave the country with himself or by any means with the same purpose.</p>
Risk Management Manual	It has the meaning set forth in the twelfth section of this Prevention Manual.
Prevention Officer	<p>Responsible for overseeing the appropriate implementation and operation of this Prevention Manual. Additionally, is responsible for ensuring the appropriate dissemination and training of the Prevention Manual to Employees, i.e. to the Company in general.</p> <p>In the Company, this responsibility is assigned to the Director of Ethics and Compliance.</p>
Persons Politically Exposed (PEP)	Individuals who perform or have performed public duties in the last two (2) years, whether in the national territory or abroad, whose activities may or may not be related to the corporate purpose of the Company, and which financial circumstances may or may not be considered as an object of public interest.
Supplier	An individual or legal entity that has any type of contractual agreement(s) for the delivery of products and/or services received by the Company in exchange for any type of consideration for them.
Warning Signs	Circumstances that evidence the behavior of Suppliers, Customers and/or Collaborators, as well as the characteristics of certain financial and/or commercial operations that may lead to identify the commission of and/or participation in any of the Included Offenses.
Prevention System	It has the meaning set forth in section 6 of this Prevention Manual.
Bribery	It includes any of the following offenses: (i) Generic Active Bribery; (ii) Specific Active Bribery; and, (iii) Transnational Active Bribery.

Influence Peddling	It occurs when a person, invoking or having true or simulated influence, receives, causes to give or promises for himself or for a third party, a gift or promise or any other advantage or benefit offering to intercede before an official or public employee who will hear, is hearing or has heard a judicial or administrative case.

4. ELEMENTS OF THE PREVENTION MODEL

4.1. The Prevention Officer and his/her designation:

The Prevention Officer is the Company's officer who has the authority, position, power and independence required for the faithful compliance with the elements of the Prevention Model.

For this reason, the General Shareholders' Meeting, the Company's Board of Directors or the corresponding administrative body will designate a person responsible for the Prevention Model, called "Prevention Officer", whose key responsibility will be to implement the Prevention Model. It consists of an organization, administration and supervision system to avoid, prevent and/or mitigate the commission of and/or participation in the Included Offenses by the Company. The Model must comply with the standards required by the different Legal Rules, as well as the local and international compliance standards.

For these purposes, and in order to fully comply with his/her duties, the Prevention Officer will have total and complete autonomy with respect to the organization, administration and supervision of the Company, as well as its Employees and/or bodies and/or supervisors. Furthermore, he/she shall have direct and rapid access to the various component bodies of the Company.

The Prevention Officer is responsible for the following:

- Supervise the design and implementation of the Prevention Model.
- Advise and guide the Company's personnel on the Prevention Model and Manual.
- Ensure that the Prevention Model and Manual comply with the requirements of the Legal Rules.
- Verify compliance with the policies and procedures of the Prevention Manual and that they are known by the Supplier, Customer and Employee.
- Design, present and disseminate the Employee training program, and ensure the optimal transfer of its content.
- Identify Warning Signals to propose improvements.
- In the event of any clarification, concern or recommendation on matters covered in the Model or in the Prevention Manual requested by the competent authorities, Customers, Suppliers and/or Employees, the Prevention Officer will be responsible for its reception, administration and resolution of each query made.

4.1.1. Authorizations and powers of the Prevention Officer:

The Company's Board of Directors and/or the corresponding administrative body will authorize the Prevention Officer with sufficient authorizations, resources and powers for the performance of each and every one of his/her duties, which are as follows:

- Sufficient authority to make decisions in relation to any of its functions, especially for the issuance of any document required for the compliance of all Employees of the Company in order to adopt measures, plans, decisions, policies and/or new documents it deems appropriate to achieve the standards of this Prevention Manual;
- Direct and permanent access to all systems and information in general throughout the Company, in order to be able to report in a timely manner of any measure, plan, decision, policy and / or new documents it deems appropriate for the appropriate performance of its functions and to account for their management;
- Access to and support from the Legal area, for the different activities arising from the implementation and/or operation of the Prevention Model and Manual;
- Access to and support from the Internal Audit area, for the different activities arising from the implementation and/or operation of the Prevention Model and Manual; and,
- Resources, materials and means suitable and necessary to adequately carry out its work in consideration of the size and commercial movement of the Company.

4.2. The Crime Prevention System:

The Prevention Officer, in collaboration with the Board of Directors and/or the corresponding administrative body, will establish a system for the prevention of the Included Offenses, which will include, as a minimum, the following guidelines:

- Identification of the Company's processes and activities, whether regular or not frequent, where there is or increases any risk of commission and/or participation of the Company with respect to the Included Offenses;
- Design and implementation of controls, in order to prevent, avoid and/or mitigate any commission and/or participation of the Company with respect to the Included Offenses;
- Establishment of tools, systems, protocols, procedures, processes, customs and other elements in general that are sufficient and adequate to intervene in the Company's processes and activities, in order to prevent, avoid and/or mitigate any commission and/or participation of the Included Offenses;
- Application of the corresponding disciplinary measures in the event of non-compliance with the prevention system,
- Establishment of appropriate reporting channels for the adequate communication of any event, fact and/or information that may be appropriate to inform the Company by any Employee, Client and/or Supplier, as well as any third party interested in providing information to the Company in relation to the Included Offenses. To this regard, the Company declares that it maintains an anti-retaliation stance, so it will not disclose and/or punish the person who reports or provides any type of information related to the potential commission of a crime or irregularity. For these purposes, the Company promotes horizontal treatment based on confidentiality, with the aim of getting to the truth in any scenario.

4.3. Supervision and Certification:

- The Prevention Officer will establish methods for the full and effective implementation of the Model, and its supervision, in order to identify and correct any shortcomings it may contain, as well as to update and/or modify it according to the circumstances and/or decisions adopted by the Company.

- The Prevention Officer, in coordination with any of the Company's areas, may carry out tests, practices, exercises or other evaluation mechanisms that he/she deems appropriate to verify total and effective compliance with the Prevention Manual.
- If the Company considers it appropriate, it may carry out the procedure to obtain the Model Certification, in order to check for its adequate design and implementation.

5. ELEMENTS OF THE CRIME PREVENTION SYSTEM

The purpose of the Crime Prevention System (hereinafter, "Prevention System") is to establish the total prohibition for any Employee to plan, develop, commit and/or participate, directly or indirectly, individually or jointly, as well as any type of initiative or act aimed at the commission and/or participation of the Company in relation to, any of the Included Offenses, or non-compliance with the Legal Rules.

For these purposes, the Company has established a set of controls, protocols, procedures, obligations and/or responsibilities in a set of documents that make up the Prevention System, which are indicated as follows:

5.1 Corporate Governance:

These are the set of policies, procedures, guidelines, among others, which are non-negotiable and mandatory behavioral guidelines that are the basis for the Prevention System, since it provides criteria, guidelines and action frameworks to conduct the management at all levels and areas of the company.

The actions of each and every one of the Employees in compliance with these regulations are essential for the correct performance of the company. The following are some of the Company's Corporate Policies:

- Code of Conduct
- Supplier Code of Conduct
- Compliance Training Program
- Anti-Corruption and Anti-Bribery Policy
- Interaction with Public Officials Policy
- Gifts and Business Courtesies Policy
- Conflict of Interest Policy
- Policy for the Prevention of Money Laundering and Financing of Terrorism.
- Corporate Antitrust Compliance Policy.
- Corporate ESG Donation Policy

All corporate and management policies are available to all employees on the corporate intranet.

5.2. Areas of support to the Prevention Officer:

The purpose of the support areas is to provide support to the Prevention Officer both in general and specific issues, when required, in order to prevent, identify, respond, supervise and monitor the Prevention System.

In this regard, such support may be required through advice, practices, exercises, meetings, coordination of activities, consultation, or other mechanisms that the Prevention Officer deems appropriate. The main areas of support include Internal Audit, Human Resources, Legal, Accounting, among others.

5.3. Prevention activities:

The main objective of the prevention activities is to prevent, avoid and/or mitigate the commission and/or participation of the Company regarding the Included Offenses, as well as non-compliance with the Legal Rules. The main prevention activities are outlined below:

5.3.1. Risk Matrix:

The purpose of the risk matrix is to keep a record indicating the existing risks related to the commission and/or participation of the Included Offenses in the different processes of the Company. It also indicates their probability and impact of occurrence, as well as the applicable control to prevent, avoid and/or mitigate the commission and/or participation of the Company with respect to such acts.

This register must keep all the Company's processes up to date, and any new activity and/or line of business must be promptly evaluated by the Prevention Officer in coordination with the support areas and others whose participation is required, in order to update, modify and/or incorporate new controls.

5.3.2. Process controls:

Based on corporate policies and internal procedures and the established risk matrix, related controls associated with the identified risks are defined aimed at two fundamental objectives: (i) to mitigate the identified risks; and (ii) to monitor and ensure compliance with the defined policies and procedures.

5.4. Identification activities:

The purpose of the identification activities is to carry out the actions required to identify non-compliance with the Prevention Manual, as well as possible scenarios of commission and/or participation of the Company in relation to the Included Offenses, and any possible non-compliance with the Legal Rules. In this regard, the following activities have been established:

5.4.1. Reporting Channels:

The Company will ensure the existence of channels available to all its Employees, Customers, Suppliers, and interested third parties who wish to report potential violations of the Prevention Manual, Legal Rules, any of the documents included in this Prevention Manual, and/or who have information about any commission and/or participation of the Company and/or its Employees in any of the Included Offenses.

5.4.2. Audits:

The Corporate Internal Audit area will conduct a set of tests and monitoring exercises throughout the year to review the correct and appropriate performance of the Prevention Manual.

The Prevention Officer, together with the different areas of the Company, will review and analyze all activity related to the commission and/or participation of the Company with respect to any of the Included Offenses, especially when they involve claims, lawsuits, fines, violations and/or any legal action or supervisory activity involving the Company with the Included Offenses, or non-compliance with the Legal Rules.

5.5. Response Activities:

The purpose of these measures is to establish sanctions, resolutions, and/or disciplinary measures to those who breach the Prevention Manual or commit and/or participate, in any way, with any of the Included Offenses, as well as to implement corrective measures, improvements, correction of deviations, etc. Hence, the following response activities are established:

5.5.1. Disciplinary measures:

Any non-compliance with the Prevention Manual will be considered a serious fault. Accordingly, the Company may apply the disciplinary measures it deems appropriate in accordance with the applicable legal framework based on the following guidelines:

- i. Any sanction must be proportional to the fault committed.
- ii. All penalties will be governed by the Company's internal procedures.
- iii. Any sanction will be applicable to all the persons involved, according to their degree of participation.

The sanctions imposed will be determined in coordination with the Prevention Officer.

5.5.2. Investigation and Reports to the Competent Authority:

In any context, the Company considers the search for the truth as an organization practice. Therefore, upon the occurrence and knowledge of any event, fact and/or information that is linked to the commission and/or participation of the Company with respect to the Included Offenses, the Company undertakes to conduct an internal investigation in order to get to the truth of what happened, identify the parties involved and evidence everything that happened. For these purposes, to the extent that the parties involved can be reliably identified and sufficient forensic evidence is obtained after the internal investigations carried out on any alleged crime, the Company may, if it deems it necessary, take the corresponding actions to report to the competent local authorities and/or any other authority it deems appropriate, in order to prosecute the persons responsible, and, in turn, to apply any applicable civil and/or criminal sanction, as required by the courts of justice of the corresponding jurisdiction and in accordance with the laws in force.

5.5.3. Changes and/or improvements to processes and controls:

The Prevention Officer will constantly evaluate any activity that contains a risk to Company, with respect to the commission and/or participation of the same in the Included Offenses.

For this reason, and in any scenario in which it is determined that the current processes or controls applicable to one or more of Company's risk activities are not appropriate to avoid, prevent and/or mitigate the commission and/or involvement of Company with the Included Offenses, the Prevention Officer will be authorized to modify and/or implement changes or improvements to protect the Company.

Furthermore, in any scenario in which it is determined that there are new activities and/or procedures that create risks for the Company that are not protected by the current controls, the Prevention Officer will be authorized to evaluate, establish and implement new controls.

Therefore, the Prevention Officer will be responsible for advising all areas involved, regarding any modification and/or implementation of any control, as well as its proper training and compliance within the Company.

5.6. Reporting:

In order to keep the Company's Board of Directors and Management informed of all information related to the commission and/or involvement of the Company with the Included Offenses, as well as to account for its management, the Prevention Officer will make and deliver a regular report to the Company's Board of Directors with a copy to the General Management (hereinafter, "Report").

Said Report will contain at least the following:

- Information related to the commission and/or involvement of the Company with any of the Included Offenses for such period.
- General report of the Prevention Officer's management for such period.
- Reports of any tests, practices, exercises or other evaluation mechanisms conducted in such period.
- Report on new regulations applicable and linked to the Prevention Manual.
- Report of compliance with the current controls applicable to all risk scenarios of the Company in relation to non-compliance with the Legal Rules, as well as the commission and/or participation of the Company with the Included Offenses.
- Failing this, report of non-compliance with the current controls applicable to any risk scenario of the Company in relation to non-compliance with the Legal Rules, as well as the commission and/or participation of the Company with the Included Offenses. In this case, it should include the whole procedure of evaluation, modification, incorporation and possible implementation of controls.
- Other reports that, at the Prevention Officer's discretion, should be communicated to the Company's Board of Directors and Management.

6. DUE DILIGENCE

The purpose of this section is to establish internal guidelines to reliably identify the Company's Employees, Customers, Suppliers and Stakeholders, whether they are regular or occasional, in order to validate that they carry out their activities in accordance with the Legal Rules and laws in force in their field and to verify that they are not involved in acts related to the commission and/or participation in the included Offenses.

Therefore, the Company has established the Due Diligence process within the Corporate Anti-Corruption and Anti-Bribery Policy, establishing the guidelines to be followed in each case in the Corporate Due Diligence Guidelines included in the Ethics and Compliance corporate policy.

The Corporate Due Diligence Guideline establishes the following processes:

6.1. Employee Due Diligence.

The Human Resources Area is responsible for performing the Due Diligence on all the Company's employees in the selection process, and from time to time, during their period of employment. In the selection process, general information is gathered about the applicants, and, then, on the selected candidate by performing a financial and reputation qualification that includes their direct relatives.

It is performed every two years for the company's employees and every year for employees in Critical Positions. This process is also performed when the employee changes position in the organization.

Critical Positions, are those positions in which:

- They have responsibility and decision in the activities of the company: Directors, Managers, Chiefs, Supervisors and Administrators.
- There is exposure to interact with Public Officials.
- There is exposure to interaction with Third Parties (Suppliers, Customers, Stakeholders, associated companies, competitors and others whose interests may affect or be linked to the Company's interests).

6.2 Customer Due Diligence.

The Commercial Area performs the due diligence on all the Company's Customers before the signing the commercial agreement or contract and from time to time as long as they keep a commercial relationship with the Company. The frequency will be defined by each operating company in agreement with the General Manager, Commercial Manager and the Director of Ethics and Compliance. This process includes:

- Customer Affidavit Request (see Commercial Due Diligence Guideline).
- Reputation Rating of the Client, its shareholders, board of directors and officers.
- Financial Qualification of the Client, review of financial statements.

6.3. Supplier Due Diligence.

The Purchasing Area is responsible for carrying out the due diligence on all suppliers at the time of their registration in the Supplier Master and from time to time as long as they keep a commercial or contractual relationship with the Company.

The first step in this process is a categorization of the supplier according to the following criteria:

- *Geographical Location*, establishing whether the Supplier operates within a high risk zone, zones recognized presence of terrorist activity, drug trafficking or organized crime, or outside of these.

- *Purchasing Level*, evaluating the annual accumulated amount of transactions carried out or planned to be carried out with the Supplier.
- *Purchase Frequency*, it involves how regular the supplier performs its transactions
- *Fiscal Situation*, it refers to whether the supplier is under administrative processes that imply sanctions or restrictions to its operation.
- This due diligence process includes:
 - Request for information in affidavit format.
 - Reputation rating of the supplier, its shareholders, board of directors and executives, depending on the category established for the supplier.
 - Financial Rating of the Supplier, review of financial statements.

6.4 Due Diligence of Beneficiaries.

The Community Relations Area is responsible for performing the due diligence on all the Beneficiaries of the Company's social support programs. Information will be requested on the entity that is the target of the benefit to be granted and its leaders and legal representatives. They are included in this due diligence process:

- Request for information in affidavit format.
- Reputation rating of the entity, its directors and legal representatives.

7. TRAINING OF EMPLOYEES

The purpose of the training of all Company employees in relation to this Prevention Manual is to train, encourage and instruct employees in the policies, procedures, controls, legal standards, actions and means available for the management and treatment of circumstances related to the commission and/or participation of the company in any of the Included Offenses.

7.1. Initial Training

Every new Employee who joins the Company must undergo an induction, in which he/she will be provided with this Prevention Manual among other related Policies. In addition, he/she will be given training on the Included Offenses and the consequences of the commission and/or participation of the Company with respect to the Included Offenses.

7.2. Continuous Training

In addition to the induction mentioned in section 8.1. above, training will be provided to all Employees in accordance with the frequency and criteria established in the Compliance Training Program, where such participation will be mandatory. In this instance, everything related to the Legal Rules and any potential modifications, replacements and/or updates will be reviewed, as well as everything related to the Included Offenses and/or the incorporation of new offenses with their respective consequences in relation to the commission and/or participation of the Company in them.

7.3. Registration and Form of Trainings

All training will be duly recorded, with a clear indication of the personnel attending the training. If necessary, an evaluation may be included to certify the learning acquired. Said training record will be kept in the personal folder of each Employee or in any other record that the Company decides to implement.

If deemed appropriate, the Prevention Officer, in coordination with any of the areas of the Company, may carry out tests, practices, exercises or other evaluation mechanisms that he/she deems appropriate to check the training and knowledge by the Employees of the Prevention Manual.

8. AUDITING OF CRIME RISK MANAGEMENT

The Internal Audit Area will audit comprehensive risk management from all activities related to the Included Offenses.

8.1. Evaluation of Controls Performance

The Company's Internal Audit area will constantly evaluate the effectiveness of the design of current controls and performance measures. In turn, this area will determine whether the set of controls allows, prevents and/or mitigates the identified risks, verifying the identified risks, and that the following basic concepts are complied with:

- *Integrity of controls:* For the same risk, there are both preventive and detective controls.
- *Implementation of controls:* Preventive controls operate before the risk activity and identification controls operate after the risk activity. For this purpose, the Internal Audit area should rely on flow charts and/or meetings with key personnel, identifying the risk and controls most appropriate to the situation.
- *Frequency of controls:* At least one of the controls should have the same or higher frequency than the risk activity.
- *Determine documentation:* Controls should be documented in a written or other electronic form, in order to ensure their correct operation independently and to determine compliance by the responsible party.
- *Training of the person(s) responsible:* Based on each employee's folder, it should be analyzed if the person responsible for the controls is trained to execute it effectively.

Finally, it should be verified if each control prevents and/or mitigates the risk through its impact, probability or both residual risk elements.

8.2. Treatment of Risks of Included Offenses

A general audit will be carried out to review compliance with each of the controls implemented, as well as to evaluate the risk matrix, where gaps and opportunities for improvement will be identified. The Prevention Officer must submit it annually to the Board of Directors with a copy to the General Management together with the quarterly report at the end of the year, with the action plans for subsequent correction.

**ETHICS AND COMPLIANCE**

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