

Version	Effective Date	Prepared by:	Reviewed by:	Approved by:
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1. INTRODUCTION

Inkia Energy's Crime Prevention Model, hereinafter referred to as the Prevention Model, consists of a system of organization, administration and supervision to avoid, prevent and/or mitigate the risk of commission and/or participation of the Company with respect to the crimes of:

- (i) Money Laundering;
- (ii) Financing of Terrorism
- (iii) Bribery, including General Active Bribery, Transnational Active Bribery, and Specific Active Bribery
- (iv) Simple and aggravated Collusion
- (v) Influence Peddling

Hereinafter referred to as "Included Offenses".

The Prevention Model works together with the Company's Ethics and Compliance Program and Corporate Governance with the aim of complying with the rules and regulations in force for the prevention of crime.

The Prevention Model shows the Company's commitment to prevent, avoid and/or mitigate the commission of and/or participation in any of the Included Offenses. It aims at providing the Company with the tools, systems, protocols, procedures, processes, customs and other elements that are sufficient to identify, quantify, monitor and control the risks of its own corporate purpose to prevent, avoid and/or mitigate the risk of commission and/or participation of the Company in any of the Included Offenses.

2. SCOPE

The Prevention Model is applicable to all companies that make up the Inkia Energy Group, hereinafter, the Company and is mandatory for all Employees of such companies, including its directors, senior management, managers, employees in general and, where appropriate, any third party related or linked to the Company contractually or commercially.

The Company will adopt the appropriate mechanisms so that its suppliers, customers and related third parties are aware of and comply, as far as they are concerned, with the provisions of the Prevention Model and Manual.

3. COMPONENTS OF THE PREVENTION MODEL

3.1. PREVENTION OFFICER

Appointed by the Company's Board of Directors or, if applicable, by its administration body, he/she has the authority, autonomy and powers necessary for the implementation and thorough compliance with the Crime Prevention Model.

Responsibilities:

- Supervise the design and implementation of Prevention Model.
- Advise and orient 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 for the knowledge of the Supplier, Client 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 case of any clarification, concern or recommendation on matters covered in the Model or Prevention Manual requested by the relevant authorities, Clients, Suppliers, and/or Employees, the Prevention Officer will be responsible for its reception, administration and resolution in the case of each consultation provided.

Authority

- Sufficient powers to make decisions in relation to any of his/her responsibilities, especially for the issuance of any document required for the compliance of all Company's Employees in order to adopt measures, plans, decisions, policies and/or new documents that it deems appropriate to implement in order to achieve the standards of this Prevention Manual;
- Direct and permanently access to all systems and information in general throughout Company, in order to be able to report in a timely manner on any measures, plans, decisions, policies and/or new documents it deems appropriate, for the proper fulfillment of its responsibilities and to be accountable for its management;
- Access and support from the Legal area, for the different activities arising from the implementation and/or operation of the Prevention Model and Manual; Access 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,
- Access to the resources, materials and means suitable and necessary to adequately carry out its work in consideration of the size and commercial movement of Company.

3.2. CORPORATE GOVERNANCE

The Company implemented Corporate Policies that support and promote the Crime Prevention Model, which is also linked to the Compliance Program, the adoption and application of these rules and policies is mandatory in all Company's operations.

The Corporate Policies related to the Crime Prevention Model include the following:

- Code of Conduct
- Code of Conduct for Suppliers

- Compliance Training Program
- Anti-Corruption and Anti-Bribery Policy
- Policy for Interaction with Public Officials
- Gifts and Business Courtesies Policy
- Conflict of Interest Policy
- Anti-Money Laundering and Anti-Terrorist Financing Policy.
- Corporate Policy on Antitrust Compliance.
- Corporate ESG Donations Policy
- Corporate Human Resources Due Diligence Guideline
- Corporate Commercial Due Diligence Guidelines
- Corporate Due Diligence Supply Chain Guidelines

Additionally, the company will develop locally applicable policies and procedures related to the compliance program and the crime prevention program, aimed at developing recommendations and control mechanisms applicable to its processes.

3.3. RISK MATRIX AND CONTROLS RELATED TO THE COMMISSION OF CRIME

The Company identified the processes and procedures related to its activities, regular or not frequent, identifying those in which there is an increase of any type of risk of commission and/or participation of the Company with respect to the Included Offenses. These risks are duly documented in the Company's Risk Matrix where they are evaluated from a quantitative and qualitative standpoint to establish their impact and relevance.

The identification of these risks allows the implementation of Controls on processes and procedures, to avoid or eliminate any involvement of the Company with respect to the Included Offenses.

3.4. WHISTLEBLOWING CHANNELS AND ETHICS HOTLINE

The Company promotes an open-door policy where employees can express their concerns and worries at all levels of the organization to: (i) Immediate Supervisor; (ii) Management Staff; (iii) Legal Area; (iv) Ethics and Compliance Officer; and (v) Ethics Hotline. Any employee may use these channels to report activities that may involve the Company's participation with respect to the Included Offenses.

The Hotline was implemented through Navex Global, an independent provider, and can be accessed by telephone or in the Hotline website (<https://inkia.ethicspoint.com>). The system is setup in the local language. All employees, as well as third parties, can submit a complaint, report or query anonymously, if they prefer. The hotline is periodically tested to ensure its availability and operability.

3.5. TRAINING PROGRAM

The corporate area of Ethics and Compliance, in coordination with the Human Resources area, provides all the company's collaborators with periodic, coherent training based on risks, its policies and processes, which is given by duly prepared persons, both in person and online. All training is offered in the language of the target audience and is appropriately documented. Training needs are updated periodically and permanently according to the needs of the

operations, the risks identified, as well as the results of the supervision and monitoring of the Corporate Compliance Training Program.

The Corporate Ethics and Compliance Area prepares the Compliance Training Program, which includes the dissemination of the Crime Prevention Model and Manual to the Company's employees.

Dissemination of the Crime Prevention Model and Manual to the Company's employees is carried out during the induction process for new employees and periodically as part of the Compliance Training Program prepared by the Corporate Ethics and Compliance Area.

3.6. EVALUATION AND CONTINUOUS MONITORING

The Corporate Ethics and Compliance Area is responsible for the periodic evaluation and updating of the Crime Prevention Model, adapting it to the Company's business and to the legal rules and regulations in force.

Continuous monitoring is performed with the support of the Corporate Audit Area on a regular basis identifying compliance with the implemented controls. The results of the audit processes are used to improve business processes and procedures, prevention controls and to update the Crime Prevention Model.

The Prevention Officer, if deemed necessary by the Company, may seek certification of the model in order to verify its proper design and implementation.

4. PREVENTION MODEL



CHANGE CONTROL

Edition	Date	Description	Updated by
1	02/08/2019	Initial version applicable to BU Peru	Romulo Yarlequé and Maria Vera
2	03/11/2022	Adaptation of model for Inkia Energy Group	Ximena Corbetto and Maria Vera
3	31/05/2022	English Adaptation	External translator