



CAMPOSOL FOODS'S code of
ETHICS AND CONDUCT





This Code represents the commitment we all have as employees in order to act with honesty and integrity towards all of our stakeholders: workers, shareholders, clients, suppliers, authorities, media, communities and other with whom we have coexistence and cooperation relations.



Content

- 4 Mission and Vision
- 4 Values
- 5 CEO's Message
- 6 Understanding the Code of Ethics and Conduct
- 8 Commitment with Our Stakeholders
- 12 Acting with integrity
- 20 Glossary
- 22 Ways of consulting or communicating concerns
- 22 Access to the Ethics Line

APPENTIX

- 23 APPENTIX 1: Code of Ethics and Conduct Adherence Commitment
- 24 APPENTIX 2: Ethical Criteria
- 25 APPENTIX 3: References

Mission and Vision

MISSION

Provide the world healthy day-to-day food with guaranteed quality, seeking the welfare of people and the environment through innovation, research and care in all details of its processes.

VISION

Become one of the main five leaders in providing healthy food to families of the world.

Values



We are honest, we honor our commitments and we are responsible for the consequences of our actions, always contemplating the triple bottom line: economic, social and environmental.



We appreciate and esteem people and we foster good relations within an environment where ideas and feedback are highly appreciated.



We share our objectives and strategies and we strive to be communicative and transparent, creating an open and flexible atmosphere where team objectives take precedence over personal goals.



We work towards achieving efficiency along the whole chain of value while maintaining strict discipline on our cost management and implementing policies that impede questionable spending.



We all work to attain the highest standards of performance, innovation and quality in all stages of our processes, activities and products. We give great attention to detail and endeavor to comply with the demands and expectancies of the international market.

CEO's Message

In its constant search for achieving the best ethical and behavioral standards, CAMPOSOL FOODS has approved this Code of Ethics and Conduct, which constitutes the framework according to which all employees must act at any time and under any circumstances, taking always care for the Company's wellbeing and good reputation.

This Code represents the commitment we all have as employees in order to act with honesty and integrity towards all of our stakeholders: workers, shareholders, clients, suppliers, authorities, media, communities and other with whom we have coexistence and cooperation relations.

In CAMPOSOL, we understand that the way we do our work will be the reflection of our conduct. Thus, our actions represent CAMPOSOL's image and its way of doing business. Hence, we have the obligation of acting with honesty and transparency, complying with the law and its regulations, acting with social responsibility, either inside or outside the Company.

The compliance with this Code of Ethics and Conduct and our Internal Labor Regulations is mandatory.

Likewise, I would like to inform you that we have an Ethics Line through which each worker, person or institution can inform anonymously, confidentially and without fear to retaliation the non-compliance of this Code of Ethics and Conduct.

This communication channel is available 24 hours a day in order for us to be able to warn about situations that go against ethics, moral and provisions of this Code, confidently knowing that the Company will manage the information with the greatest reserve and professionalism.

I appreciate beforehand your interest and I am sure that, as always, we will have your support and commitment for the right compliance and performance of our Code of Ethics and Conduct.



Samuel Dyer Coriat
CEO



Understanding the Code of Ethics and Conduct

1. ABOUT THE CODE OF ETHICS AND CONDUCT AND THE CODE OF ETHICS AND CONDUCT COMPLIANCE COMMITTEE

The Code of Ethics and Conduct describes the way we work and behave. Its contents are the reflection of our values and summarize the main beliefs of CAMPOSOL FOODS (hereinafter referred to as CAMPOSOL).

This document has been approved by the Board of Directors.

A. RESPONSIBILITY

The Code of Ethics and Conduct Compliance Committee is responsible for taking care of the right application of the Code of Ethics and Conduct amongst all CAMPOSOL's workers.

The Committee is made up of the following members:

- A Board of Director's representative
- Chief Executive Officer
- Corporate and Human Development Manager
- Legal and Corporate Affairs Manager
- Internal Auditor

B. INVESTIGATION OF POSSIBLE VIOLATIONS TO THE CODE¹

The Committee is also responsible for taking actions regarding the non-compliance to the Code and preventing them to take

place again. Therefore, the Committee also analyzes, assesses and decides about possible non-compliances received through our Ethics Line and/or other means.

The sanctions will be applied by the Corporate and Human Development Management at the request of the Code of Ethics and Conduct Compliance Committee according to the policies, procedures and Internal Labor Regulations (ILR), the legal standards in force and the offender's right to a defense according to CAMPOSOL's Manuals of Operational Procedures.²

C. SIGNATURE AND ACKNOWLEDGEMENT OF RECEIPT

Upon entering to start working at CAMPOSOL every worker must sign the "Adherence Commitment." Only those workers that were working at Camposol before the approval of this Code will be allowed to adhere to it afterwards according to the schedule implemented for its subscription.

Signing the "Adherence Commitment" confirms that the worker has read the Code of Ethics and Conduct and accepts to comply with its provisions. The Corporate Human Management shall request and verify that all workers have signed it.

It is noteworthy that not having read the Code or not signing the "Adherence Commitment" is not an excuse for a worker not to comply with it.³

2. SCOPE OF THE CODE OF ETHICS AND CONDUCT

The conducts gathered in this Code are of mandatory compliance for all CAMPOSOL's workers, regardless of their position, geographical location or level of responsibility. All people working at CAMPOSOL are responsible for protecting our integrity and applying the Code.

This Code does not intend to cover all possible situations that can arise, but to establish the minimum conduct guidelines that must guide the performance of all workers during the development of their activities.

All CAMPOSOL's workers are responsible for haven a clear understanding of the Code. Besides, we expect our suppliers, clients and third parties with whom we do business to adopt similar standards.

A. THE CODE AND THE LAW

The Company's operations and workers are subject to the laws of many countries and other world jurisdictions. It is expected for workers to comply with the Code and all applicable governmental laws, norms and regulations. If any proceeding set forth in the Code contravenes an applicable Law, the Law shall prevail.

The conducts gathered in this Code are of mandatory compliance for all CAMPOSOL's workers, regardless of their position, geographical location or level of responsibility.





Commitment with Our Stakeholders

The principles below are based on our values and represent the pillars of our work ethical system⁴:

A. WORKERS

Diversity, equal opportunities and respect

- We respect our work environment and our workers and we take care of CAMPOSOL's reputation and good image.
- We value cultural pluralism and diversity. Respect each other and intend to keep an inclusive environment free of discrimination, intimidation and harassment due to race, religion, sex, age, physical capacities, nationality or another condition.
- No verbal, digital or physical harassment based on any reason is accepted.
- We treat all our workers with respect, dignity, justice and courtesy. No physical or psychological punishment, confinement, violent threats or any other form of harassment or abuse as a disciplinary and control method is allowed. Harassment and sexual harassment are not allowed at CAMPOSOL.⁵
- We develop and promote team spirit. We build relationships amongst us based on a shared trust with the certainty that each has the personal and professional commitment to doing the right thing.
- We are committed to communicating openly and honestly. We consult each other and value the points of view of those who differ from us, as well as those who question our own point of view.
- We respect and do not interfere in workers' decisions and the right to freedom of association or non-association and to collective bargaining.
- We promote the professional and human growth of our workers and foster meritocracy, recognition and continuous learning.
- We provide our workers with wages and benefits that comply with the applicable laws and corresponding collective agreements.
- We comply with laws, regulations and standards applicable to the sector. We respect the provisions of the Internal Labor Regulations and the Offender's Right to a Defense.
- We comply with BASC standards and commit to promoting a safe environment for visitors and sub-contracted personnel and for the development of processes in general, out of acts of violence, sabotage, intimidation, drug trafficking and/or terrorism, and each and every illegal activity or action of intentional contamination to the product or the organization in general.

B. SAFE AND HEALTHY WORK ENVIRONMENT

- In CAMPOSOL we value people's life, integrity and health to its fullest, and promote a safe culture based on prevention to avoid accidents and occupational diseases.
- We make sure to keep a safe and healthy work environment for our employees, visitors and clients. Nothing justifies putting at risk a person's physical integrity and health.
- We promote a prevention culture based on the participatory occupational safety and health policy⁶, guaranteeing the consultation and participation of all Company workers.
- We always act according to the Company's internal policies on this matter, technical volunteer adherence regulations and national laws on safety and health applicable to the sector where we develop.
- We care about sharing with and requesting our suppliers the necessary safety and health measures and demanding evidence of their compliance.
- We take actions and report timely and with due diligence risks or accidents. We have, for this, systems for detecting, preventing and answering to possible safety and health risks of all our employees.
- We do neither accept drugged and/or drunk people entering our facilities nor them using drugs and/or alcohol inside the facilities according to the approved guidelines.



We make sure to keep a safe and healthy work environment for our employees, visitors and clients. Nothing justifies putting at risk a person's physical integrity and health.





C. SHAREHOLDERS

- We value the independence of thinking and protect the trust that Shareholders and Directors have deposited into us. We then commit to acting and taking decisions in the best and genuine interest of CAMPOSOL and its stakeholders within the framework of an ethical behavior and according to law.
- We respect and comply with policies, procedures and controls applicable to our responsibilities and we search its continuous improvement over time. The policies and procedures are specific and can go beyond the requirements of the law.
- We are committed to protecting CAMPOSOL's reputation, assets and ethical culture and, therefore, we take measures to prevent risks and sanction irregular actions.
- We perform our tasks with professionalism, diligence and objectivity to identify and timely report the signs of internal or third-party activities that may prejudice CAMPOSOL and its workers.
- Before events that put CAMPOSOL or its workers at risk, we must consult Senior Management before taking actions and avoid exceeding the authority delegated to us.
- We expose to the Board of Directors, in a timely manner all risks and facts with transparency.

D. CLIENTS, SUPPLIERS AND COMPETITION⁷

- We treat our clients and suppliers with respect and dignity. We honor our promises, agreements and commitments.
- We develop relationships based on trust, transparency, honesty and mutual respect always maintaining a long-term view.
- We are committed to maintaining our clients' trust and loyalty through the delivery of quality products and the transparent disclosure of appropriate information that allows them to make informed, traceable and responsible choices.
- We acknowledge the importance of our suppliers for achieving our objectives. We are transparent, honest, fair and careful in our negotiation, selection and exchange processes. Therefore, we are committed to keeping our suppliers informed about the terms and conditions of this Code.
- We compete vigorously and honestly basing on ethical principles and in the full compliance of the legal norms regulating the markets
- The commercial policy and prices will be independently established and will never be agreed upon, either formally or informally, with competitors or other non-related parties in a direct or indirect way.
- We have a protocol policy of good relations which allows us, within the legal framework in force, to protect common, union and competitors' interests, highlighting the sector and country interest and the wellbeing of our workers in agreement with the Rule of Law and promoting the juridical stability of the Peruvian State.

E. COMMUNITY, ENVIRONMENT AND STATE

Community

- We have a sound commitment to the respect of human and labor rights; we do not participate in actions that go against those rights.
- We prohibit and reject child labor, either any physical, mental, social or morally dangerous labor for children.
- We do not allow and reject any kind of servitude or any form of forced labor. We do not subcontract suppliers or production facilities that force the work to be carried out by workers under any kind of exploitation or forced labor.
- We act in a socially responsible manner within the laws, customs and traditions of the communities where we operate and contribute to their sustainable development.⁸
- We promote open, sincere, constructive and mutually beneficial relations with societies and communities where we develop our operations.
- We acknowledge our responsibility as members of companies that play an active and positive role in supporting a worthy quality of life and sustainable society.

Environment⁹

- We understand the importance of environment for current and future generations and business sustainability; therefore, we are committed to developing environmentally sustainable activities in compliance with laws and standards applicable to our businesses.
- We promote a culture of environmental protection and an efficient use of resources.

- We develop good productive practices prioritizing the appropriate use of our resources in all operations and specially emphasizing on water and power care.
- We search for solutions and strive for technology development in order to minimize our impact on the environment.
- We are diligent to identify and support the implementation of proper actions for preventing, controlling and/or correcting conditions related to environmental risks.
- We value to interact with commercial partners that maintain good environmental standards.

State

- We respect the authority of public entities and officers in all places where we perform our businesses, and maintain transparent, honest and ethical relationships with them.
- We are especially careful in our interactions with public officers and candidates to public positions in order to guarantee that our actions comply in form and content with the guidelines of this code, as well as political impartiality as Company.
- We provide exact, opportune and appropriate information to the State of the countries where we act and to regulatory bodies, and we understand that mistakes or omissions can damage CAMPOSOL's reputation and credibility.



We have a sound commitment to the respect of human and labor rights; we do not participate in actions that go against those rights.



Acting with integrity

A. WHAT TO EXPECT FROM EACH ONE?

- To understand the Code.
- To comply with the Code and law wherever you are.
- To use good judgment and even prevent to produce an improper behavior.
- Before acting, consider your actions, be thoughtful and prudent and, in view of doubt, ask for advice or opinion if you have any doubts or if you are misinformed.

If at any time you have a doubt about a behavior, ask yourself:

- Is this congruent with the Code?
- Is it ethical?
- Is it legal?
- Will this reflect well on my image and the Company's?

If the answer to any of these questions is "No", do not do it.

If you still have doubts, ask for advice. The Code tries to cover some of the situations that workers may have to deal with, but cannot consider all circumstances.

You can try to obtain help from:

- Your Manager
- Legal and Corporate Affairs Manager
- Controller
- Corporate Human Development Manager
- Internal Control Manager
- Internal Auditor
- Through the Ethics Line

B. WHAT TO EXPECT FROM THE BOSSES?

If you are a director, manager, assistant manager, superintendent, head of department or supervisor, you must lead with integrity, set the example every day, and help to maintain a high conduct and ethics standard in CAMPOSOL and everywhere you interact.

Bosses must always be models of the proper behavior.

As a boss, you must:

- Guarantee that the people you supervise understand their responsibilities according to the Code and other policies of the Company.
- Reinforce the importance of ethics and the compliance.
- Create an environment where workers feel comfortable to express their concern without being afraid of retaliations.
- Value the behaviors regarding the Code and other policies of the Company when workers are assessed.
- Never foster or give orders to workers in order them to obtain results against an ethical behavior and non-compliance with the Code, law and/or internal regulations.
- Always act proactively to prevent and avert violations to the Code, law or internal standards by those who are under your supervision.
- Be proactive in reporting immediately any fact or situation of which you may be knowledgeable, either inside or outside the Company, and that may affect or possible be non-compliance with the Code of Ethics and Conduct or that may have the potential to damage the image of the Company. Likewise, you must inform about any fact or

If at any time you have a doubt about a behavior, ask yourself:

Is this congruent with the Code?



Will this reflect well on my image and the Company's?

If the answer to any of these questions is "No", do not do it.

situation that, either actually or potentially, may generate ethical or legal non-compliances that the staff under your responsibility reports to you in order to be known by the proper authorities if they have ethical or legal relevance.

Answering the questions and concerns

If someone asks you a question or expresses a concern about the Code, listen carefully and pay close attention to the worker. Request clarification and additional information. Answer all questions if you can, but do not feel forced to give an immediate answer. Request help if you need it. Communicate with your Manager or Legal and Corporate Affairs Manager, Controller or Internal Auditor.

Expressing concerns

If you see a behavior that worries you or that can represent a violation to our Code, report the problem immediately. When doing this, you will provide the Company with the opportunity of dealing with the problem and solve it, preferentially before becoming a violation to law or a risk for health, safety and CAMPOSOL's reputation.

CAMPOSOL has a service called Ethics Line which purpose is to provide workers as well as other stakeholders with another tool for expressing their concerns, doubts and/or claims due to faults to the Code of Ethics and Conduct.

C. ANONYMITY AND CONFIDENTIALITY

Any worker notifying an incident through the Ethics Line and/or through several means can opt to remain anonymous,

although we foster them to identify themselves in order to facilitate communication. If the reporter provides his/her name, investigators will take all reasonable precautions to keep it confidential and carry out a thorough and fair investigation.

D. INVESTIGATIONS

All workers are forced to participate as required in any investigation. The Company considers seriously all reports of possible faults to this Code of Ethics and Conduct, and assumes that its workers are responsible for reporting any fault.

The matter will be investigated in a confidential manner and investigators will establish if the Code or law has been violated and will take the corresponding corrective measures. If you participate in an investigation on the Code, you must feel secure that the Company will protect you and that is why you must cooperate and answer all the questions with integrity and honesty.

E. THERE WILL BE NO RETALIATION

CAMPOSOL values the help of workers that identify the possible problems required to be discussed and makes all efforts to give them the proper treatment within the legal framework in force. Any retaliation against a worker reporting a problem with honesty represents a violation to the Code.

A worker reporting a concern with honesty or participating in an investigation cannot be the basis of an action prejudicing his/her job, including separation, demotion, suspension, loss of benefits, threats, harassment or discrimination.



If you work with someone that has expressed a concern or provided information in an investigation, you must continue addressing such person with courtesy and respect. If you consider he/she has been object of retaliations, indifference or any other similar or equivalent behavior, report it to the Ethics Line in order for the corresponding measures to be taken.

F. FALSE ACCUSATIONS

The Company shall protect all workers expressing a concern with honesty, but it is a violation to the Code to make, on purpose, a false accusation, lie to investigators, deny or refuse to cooperate with an investigation related to the Code. Honest information does not imply that you have the reason when reporting a concern, you must be only sure that the information you provide is accurate or that there are indications that deserve an investigation.

1. INTEGRITY IN THE COMPANY

Acting with integrity also includes how we handle the Company's records, goods and information.

- Commercial, financial and safety records
- Company's goods
- Use of information
- Nonpublic information
- Privacy

A. COMMERCIAL, FINANCIAL AND SAFETY RECORDS

Provide accuracy and veracity in all commercial and financial records of the Company. These records include not only the financial statements but also other records, such as, for instance, quality reports, schedule records, expenses records, etc.

We all are responsible for diligently managing all CAMPOSOL's information in each process, as well as using it properly. It is forbidden to hide Company information (or regarding it) or to use it improperly.

Guaranteeing that commercial and financial records are accurate and complete is a responsibility of all, not only a function of the accounting and finance personnel. Keeping accurate records and information reflects in the Company's reputation and credibility and guarantees CAMPOSOL to comply with its legal and regulatory obligations.

- Always records and classifies the transactions in the corresponding accounting period and in the corresponding account and department. Do neither delay nor accelerate the income or expenses to comply with the budgetary goals.
- Estimates and accrued amounts must be supported by the corresponding documentation and must be based on the best judgment.
- Be sure that all reports sent to regulatory authorities are complete, reasonable, accurate, opportune and understandable.
- Never forge a document.
- Do not distort the true nature of a transaction.

B. PROTECT THE COMPANY'S GOODS AND SERVICES AND USE THEM FOR THE PROPER PURPOSES

- The Company's goods and services are of exclusive use for the functions they have been entrusted. Do not use the Company's goods for your personal benefit or for the benefit of any other beneficiary other than the Company.
- All data and information received and sent with the Company's equipment must be restricted to the exercise of the functions entrusted. In this sense, it is established that all this information is CAMPOSOL's property and, therefore, it can be recorded, revised and used for the commercial and investigative purposes that are better for its interests, within the legal limitations that can be applicable.
- Use your common sense. For instance, the occasional personal call or email from your workplace is acceptable. Excessive personal calls or emails are an improper use of goods, for instance to send chains, make long personal calls. In no case, CAMPOSOL is responsible for the maintenance, care or protection of the personal information the workers freely save in the Company's goods through their daily or eventual use. Therefore, the person that makes personal use of the Company's goods or services assumes the limitations and controls CAMPOSOL has established.
- The theft or appropriation of the Company's goods or assets (without express written authorization), that can be either physical (equipment, office supplies, work, etc.) or of any other kind (for instance, through abstraction of Company information, modification of hours worked, commercial strategies, human resources management plans, etc.), will



The Company's goods and services are of exclusive use for the functions they have been entrusted. Do not use the Company's goods for your personal benefit or for the benefit of any other beneficiary other than the Company.





give place to dismissal according to law and to the beginning of civil and penal responsibility proceedings, without prejudice to the corresponding indemnification for damages.

- Do not participate in personal activities during working hours that may interfere with or prevent you to comply with your working responsibilities, unless you have the express authorization of your manager.
- Do not use the Company's computers and equipment neither for external businesses nor for illegal or unethical activities such as games of chance, pornography or another offensive issue. Furthermore, do not install applications and software that have not been authorized by IT Management.

C. USE OF INFORMATION

Protect all the Company's nonpublic information that includes workers' personal information, contacts, pricing information, marketing plans, technical specification and information on the workers, among other.

Do not share your passwords to the systems with absolutely no coworker, even your manager or your subordinates.

D. NONPUBLIC INFORMATION

Do not disclose nonpublic information to anyone outside the Company, including relatives and friends, unless you require it for commercial purposes.

E. PRIVACY

The Company respects the privacy of all its workers, commercial partners and consumers. We must use the personal data with responsibility and in compliance with all applicable privacy laws. Workers that handle others' personal information must:

- Act according to applicable law;
- Act according to all corresponding contractual obligations;
- Gather, use and process such information only for legitimate commercial purposes;
- Restrict the access to information to those who have a legitimate commercial purpose for seeing such information; and,
- Be careful not to disclosure such information without authorization.

2. CONFLICTS OF INTEREST

The Code cannot cover all possible conflicts of interests, so use your consciousness and common sense. If you are not use, ask for advice.

Act in terms of CAMPOSOL's best interest while doing your work. A conflict of interest takes place when your personal activities and relations interfere or seem to interfere with your capability to act in terms of the Company's best interest.

Be especially careful if you are responsible for negotiating with a supplier as a representative of the Company. Your personal interests and relations must neither interfere nor seem to

interfere with your capability to take decisions in terms of the Company's best interest.

When selecting suppliers, follow always the Company's applicable hiring guidelines.

A. EXTERNAL JOB

You can, in general, have a job outside CAMPOSOL provided that your external job does not interfere with the schedule and your capacity to perform your work within the Company.

You can neither be a worker nor provide in any other way services or receive payments from any Company's client, supplier or competitor without the prior approval in writing of your Manager and the Legal and Corporate Affairs Manager.

B. RELATIVES AND FRIENDS

Some workers have relatives that are workers, invest with clients, or are CAMPOSOL's suppliers. These financial interests generate a conflict according to the Code unless:

- You do not have a discretionary authority to negotiate with any of these companies as part of your job at CAMPOSOL; in any case, you must inform your manager in writing to record this fact and, prior authorization, communicate if you have the approval to negotiate with this company, but must not influence the decision to be taken with the company or natural person. If you do not comply with this procedure, you will be no longer trusted and consequences of law will be applied.

C. GIFTS, MEALS AND ATTENTIONS

- You can accept modest gifts. Some examples of acceptable gifts include: pens with advertising logos; shirts, t-shirts or caps with commercial logo, gift baskets in end-of-the-year parties. None must exceed S/. 100.00 nuevos soles.
- You can accept symbolic gifts, such as trophies and figurines, but those with inscriptions recognizing a commercial relationship.
- Gifts or any other such as trips, money, baskets, etc. received in particular residences or addresses will be considered as serious ethical faults, so the trust the Company had on the offender will be immediately removed.
- Gifts or discounts offered to an important group of workers as part of an agreement between the Company and a client or supplier can be accepted and used according to plan, prior announcement to all employees by the Corporate Human Development Management area.
- Do not offer, invite, accept or ask meals or any other kind of attentions outside our offices in exchange for doing or receiving favors to or from a client or supplier.
- You can accept meals and other kind of occasional attentions from clients and suppliers if the event is also attended by the client or supplier and the involved costs are according to the local customs for meals and attentions related to the business. For this, you must have the authorization of your immediate boss and issue an executive report of the meeting objective and achievement.



Your personal interests and relations must neither interfere nor seem to interfere with your capability to take decisions in terms of the Company's best interest.



D. TRIPS AND IMPORTANT EVENTS

- If a client or supplier invites you to an event that includes a trip out of the city or stay or to an important event, ask your Manager to determine if there is a reasonable commercial justification for your attendance and request a written authorization explaining the trip objective and timetable. In such case, the area Manager must authorize if CAMPOSOL should or not pay the trip, stay and traveling expenses for attending the event according to the Company's standards and to the attention of the General Manager.
- The Managers' trips will be only authorized by the General Manager under the same aforementioned criteria.

E. REJECTION OF GIFTS, MEALS AND ATTENTIONS

- If you are offered a gift, meal or other kind of attentions that exceed the aforementioned limits and standards, reject them politely and explain the Company's standards. If the return of a gift may offend the person who gave it or the circumstances, reject it politely as well and, therefore, request the Corporate Human Development Management a letter explaining the reasons of this decision.

3. INTEGRITY IN THE NEGOTIATION WITH THIRD PARTIES

A. NEGOTIATIONS WITH THE GOVERNMENT

The global nature of our business requires us to interact

with officers from different governments in the world. The transactions with governments are covered by special legal regulations and are not equal to doing business with individuals. Ask the Legal and Corporate Affairs Management to be sure of knowing, understanding and complying with these standards.

In general, do not offer anything to a governmental officer, either directly or indirectly, in exchange for a favorable treat.

B. ANTICORRUPTION AND ANTI-BRIBERY PRACTICES

A bribe consists in giving or offering something of value to a private or governmental officer to influence a discretionary decision. Some examples of bribes include a payment to a private or governmental officer to favor a decision to grant or continue with the commercial relations, influence the result of a governmental audit or inspection or influence the fiscal or other kind of legislation. Other payments to governmental officers can also represent bribes in some jurisdictions. Ask the Legal and Corporate Affairs Management to be sure of knowing, understanding and complying with these standards.

C. NEGOTIATIONS WITH CLIENTS, SUPPLIERS AND CONSUMERS

Always negotiate honestly with the clients, suppliers and consumers and treat them with honesty and respect:

- Do not participate in disloyal, deceitful or confusing practices.

- Always show the Company's products in an honest and direct manner.
- Do not offer, promise or give anything to a client or supplier in exchange for obtaining an advantage for the Company or for you or third parties
- Always record your negotiations and communications in documents or mails.

D. COMPETITIVE INTELLIGENCE

Workers are asked to gather, share and use information about our competitors only in a legal and ethical way. As the Company values and protects its own nonpublic information, we respect the nonpublic information from other companies or institutions.

E. FORBIDDEN ACTIVITIES

The following basic restrictions apply to our capacity to gathering competitive intelligence:

- Do not participate in illegal or illicit activities for obtaining competitive information. This includes theft, entry without authorization, eavesdropping, phone tapping, hacking, privacy invasion, bribery, misrepresentation or scavenge.
- Do not accept, reveal or use competitive information that you know or have reasons to believe that was revealed in violation of a confidentiality agreement between a third party and one of our competitors or suppliers.



Always negotiate honestly with the clients, suppliers and consumers and treat them with honesty and respect.



Glossary

The Glossary defines some of the terms used in the Code of Ethics and Conduct. If these definitions or other terms or sentences used in the Code are still unclear, ask your Management or Human Development Management.

Something of value: Anything that could have value for a governmental officer, including money, gifts, other kinds of attentions, commercial opportunities, Company's products, job offers, etc. There is no monetary limit; any amount could be interpreted as a bribe.

Business Alliance Security Commerce (BASC): It is a non-profit international business alliance that promotes a safe commerce in cooperation with governments and international organizations.

Company's goods: They include, among other things, money or Company's products, work time and product of the work of workers, computer systems and programs, telephones, wireless communication devices, copy machines, Company's vehicles, Company's own information and commercial brands.

Client: Any company or entity to which CAMPOSOL sells a finished product.

Code of Ethics and Conduct Compliance Committee: A committee made up of directors and senior managers that represent the corporate management functions and operations and are responsible for managing and complying with the Code of Ethics and Conduct.

Competitor: Regarding only the provisions on Conflicts of interest and competitive intelligence, “competitor” means any company or entity other than CAMPOSOL.

Offender’s Right to a Defense: The right to a guaranteed defense, among other things, that a person, who is submitted to an investigation and where his/her rights and interests are under discussion, has the opportunity to contradict and argue in support of such rights and interests.

Ethics Line: The Company’s Information Line, managed by a third party through which workers and others can ask questions and express concerns anonymously about the Code of Conduct or other issues regarding ethics and conduct.

Relative: A spouse, father/mother, brother/sister, grandparent, son/daughter, grandchildren, mother-in-law, father-in-law or same sex or different sex partner, common-law husband/wife, as well as any other family member living with you or depending financially on you or on whom you depend financially.

Nonpublic information: Any information the Company has not formally disclosed or made public that can include information related to workers, contracts, strategic and business plans, important management changes, launching of new

products, mergers and acquisitions, technical specifications, prices, proposals, financial information, and product costs.

Competitive intelligence: Process for obtaining, analyzing, interpreting and spreading strategically valuable information about the industry and competitors.

Supplier: Any product or service supplier to the Company, including consultants and contractors. The definition also includes any supplier the Company is actively considering to use, even if no business is finally granted.

Bribe: Giving or offering something of value to a private or governmental officer that can influence a discretionary decision. Local law can impose a wider definition in some jurisdictions.



Ways of consulting or communicating concerns

If you have a question or concern or consider that a worker's behavior does not comply with the Code, you have the obligation to present this information immediately, so preventing this matter to become a more serious or prejudicial problem for you or CAMPOSOL.

It is not necessary to be directly affected by the non-compliance to the Code; we are responsible for reporting any concern or situation we perceive and identify during our daily work.

In these cases:

- Talk to your Immediate Supervisor or Line Manager.
- Consult with any member of the Code of Ethics and Conduct Compliance Committee.
- Report it through the Ethics Line.

We require your help for knowing the situation, assessing the case and taking appropriate measures.

Our Ethics Line

It is a service created to support you and facilitate the resolution of inquiries and doubts about the compliance of the Code of Ethics and Conduct. Any communication shall be treated seriously, professionally and confidentially.

Access to the Ethics Line

You can access CAMPOSOL's ethics line through:

Web page:

<http://50.63.73.143/lineaeticacamposol/>

Email:

linea-etica@linea-etica.camposol.com.pe

Telephone:

0-800-2-0820 option 2. Free and anonymous call (at a national level).

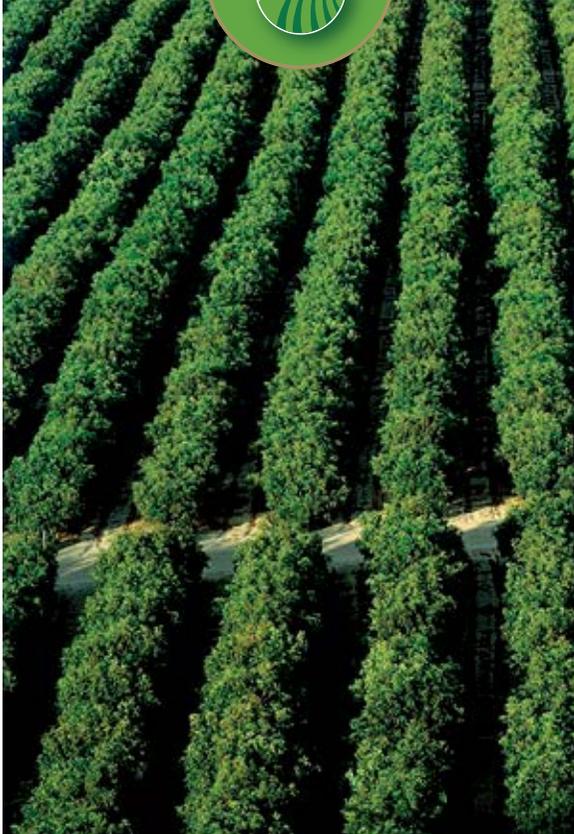
Postal address:

If you want to provide a copy of any information physically, send it to the following post office box in Lima, 27A – 012. Reference: CAMPOSOL's Ethics Line. Available any time.

Personal interview:

If you want to be personally received by professionals, you can go to: Av. Víctor Andrés Belaúnde 171, Piso 3, San Isidro, Lima 27, Lima – Peru.

Ask for: Mr. Rafael Huamán, available Monday thru Friday from 8:30 am to 6:30 pm or, at other time (pre-arranged appointment).



CODE OF ETHICS AND CONDUCT ADHERENCE COMMITMENT.

I do hereby declare that I have received and read CAMPOSOL's Code of Ethics and Conduct and, therefore, I state that I understand and share the ethical guidelines detailed in such document.

I commit to respecting it and acting with integrity, setting the example and diligently communicating, through the Ethics Line or to other instances, any behavior that does not comply with this Code.

Full name:

Management / Office:

Position:

Area:

Date:

Signature:

Submit this signed document to the Corporate Human Development Management.

Appendix 2

ACCORDING TO OUR SOCIAL RESPONSIBILITY POLICY AND TO THE IMPLEMENTATION OF THE INTERNATIONAL STANDARD SA 8000 AND OTHER CERTIFICATIONS THAT PROMOTE THE HIGHEST LABOR AND/OR SOCIAL RESPONSIBILITY STANDARDS WORLDWIDE, CAMPOSOL RULES ITS OPERATIONS ACCORDING TO THE FOLLOWING CRITERIA:



CHILD LABOR

CAMPOSOL forbids child labor. Employees must be at least 18 years old when hired. Child labor refers to any mental, physical, social or morally dangerous or harmful activity for children or any activity that directly interferes in their compulsory education needs defined as such by the corresponding authority.



DEPRIVATION OF FREEDOM AND FORCED LABOR

CAMPOSOL forbids any type of enslaving servitude or any form of forced labor. CAMPOSOL shall neither require any deposits nor withhold original ID documents as a work condition. Likewise, the company shall not subcontract suppliers or production facilities that force work to be conducted by employees under any kind of exploitation or forced labor.



SAFETY AND HEALTH AT WORK

CAMPOSOL provides a safe, hygienic and healthy workplace and takes the necessary measures to prevent accidents and injuries that may arise, be related to or take place during work or as a result of the company operations. CAMPOSOL has systems to detect, avoid or respond to possible risks to the safety and health of its employees. Employees could refuse to conduct any type of unsafe work or any work that risks their life.



FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

CAMPOSOL respects the decisions of its employees and the right to association and collective bargaining. The company does not interfere in any way in the establishment, operation or administration of such organizations of employees, neither in the collective bargaining activities.



WORK SCHEDULE

CAMPOSOL is responsible for guaranteeing its employees to work according to the applicable laws and labor standards regarding the number of working hours and days. If there is any conflict between a statute and a mandatory industrial standard, CAMPOSOL must solve this situation according to what is established regarding which standard provides a larger benefit for the employee. Personnel must have at least one day off after a consecutive period of six working days.



DISCRIMINATION

CAMPOSOL forbids discrimination practices in contracting personnel and in their professional behavior due to race, color, religion, sex, age, physical capacities, nationality or any other legally prohibited condition.



DISCIPLINARY MEASURES

CAMPOSOL must treat all its employees with dignity and respect. The use of corporal punishments, psychological punishment, confinement, violent threatening or any other form of harassment or abuse as method of discipline and control is neither practiced nor tolerated.



SALARY

CAMPOSOL must provide its employees with salaries and benefits that comply with the applicable laws and corresponding collective agreements, including those referring to the payment of overtime and other extra pay agreements.



SUSTAINABILITY

CAMPOSOL develops good productive practices having as priority the proper use of its resources in all its operations and especially emphasizing in the use of water and energy.



ENVIRONMENTAL CARE

CAMPOSOL conducts its operations pursuant to the applicable norms and its environmental commitments that include monitoring of emissions, management of sewage waters, environmental noise, and solid waste, among others; thus allowing to mitigate its environmental impacts and helps to continually improve its environmental performance.



SUPPLY CHAIN

CAMPOSOL shall guarantee its suppliers to be informed of this Code of Conduct, its terms and conditions, its meaning and what its implementation implies. This Code of Conduct shall be part of CAMPOSOL's training programs to its supply chain.

Appendix 3

¹ Responsibilities and investigation procedure are in the Manual of Operational Procedures: CSOL-RH-MP-006- NP "Protocol for complaints to Ethics Line".

² CSOL-RH-MP-004-NP "Disciplinary measures application procedure"; Internal Labor Regulations: Chapter 7, Article 53.

³ See Appendix 1

⁴ See Appendix 2

⁵ Internal Labor Regulations: Chapter X, Article 62.

⁶ Occupational Safety and Health Policy: CSOL-GG00-022-CT

⁷ Procurement Policy: CSOL-AD-12-PL-01

⁸ Sustainable agriculture policy: CSOL-GG00-005-CT

⁹ Environmental policy: CSOL-GG00-024-CT





www.camposol.com.pe