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CORPORATE POLICY FOR THE PREVENTION OF FRAUD, CORRUPTION AND MISUSE OF POSITION

1. Objective

Establishing the general guidelines, reference framework, and procedures to be followed for the prevention and detection of acts of fraud, misuse or abuse of position and corruption - both in terms of public officials as well as private corruption.

2. Scope

This policy applies to all employees and members of the Board of Directors of ALICORP S.A.A. and its subsidiaries, hereinafter "ALICORP" or "the Company."

ALICORP adopts a zero-tolerance policy if any employee (regardless of the position held or the time the same has been performing their activities in ALICORP) or member of the Board commits, participates, contributes and/or has knowledge of, and fails to report, any act or conduct that constitutes fraud, misuse or abuse of a position, or corruption.

3. Responsibilities

The Audit Committee is responsible for supervising and ensuring compliance with the Policy.

The Company's General Management is responsible for promoting an anti-fraud culture and ethical behavior at all levels, as well as for communicating the importance of preventing irregular acts (such as fraud and misuse of a position) and zero tolerance for acts of corruption. It is also responsible for providing the implementation of mechanisms to detect and prevent such acts and make the necessary resources available to the people responsible for these in order to ensure compliance with the Corporate Policy for the Prevention of Fraud, Misuse of Position and Corruption (hereinafter, "the Policy").

The Corporate Vice President of Finance and the Legal and Compliance Director are responsible for the effective implementation of the Policy. The Vice Presidents and Country Managers are responsible for strengthening the anti-fraud and ethical behavior culture in their areas, with special consideration and care for the actions that constitute fraud as previously indicated.

Employees and board members are responsible for complying with this Policy as well as reporting any situation that may be perceived as irregular or inappropriate. In the case of employees, these may do so through their immediate superior, the Corporate Vice President of Human Resources, ALICORP's Ethics Line, and the Corporate or Local Ethics Committee, as appropriate. In the case of board members, they shall contact the Audit Committee.

4. Definitions

- **Fraud:** any intentional omission or act, designed to deceive others, carried out by one or more persons in order to appropriate, exploit, or take advantage of another's property, whether material or intangible, in an improper manner, to the detriment of another and, generally, due to the lack of knowledge or suspicion of the affected party. For purposes of this Policy, fraud is considered as using a position assigned by the Company to achieve personal benefit or benefit for a third-party through the misuse of the Company's resources or assets.

In an illustrative manner, the definition of Fraud comprises the Misappropriation of Assets and the Alteration of Financial Statements (or other reports):

- **Misappropriation of Assets:** Any act of using the Company's assets or those of their responsibility, and/or permanently or temporarily in their custody, for their own benefit or that of third parties, by the persons affected by this policy. In general, the misappropriation of assets is considered to be any appropriation, diversion, or misuse of property owned or held by the Company, to be used for purposes other than those for which they have been specifically acquired or received.
 - **Alteration of Accounting or Financial Information:** Any alteration, misrepresentation, or intentional false presentation of accounting or financial information, through inaccuracy or omission of certain transactions in a manner that does not reflect the reality of operations and the financial decisions made.
- **Misuse of position:** any dishonest activity in which persons affected by this Policy act against the interests of the Company and abuse their position, functions, or means to obtain a personal benefit, or an advantage for them or a third-party.
 - **Corruption of public officials:** to offer, give or promise, in any manner, a donation, promise, advantage, or benefit to a public official for themselves or for third parties, with the purpose of performing or omitting acts, which imply the fulfillment or non-fulfillment of their function, or to influence other public officials or administrative or public decision acts.
 - **Private corruption:** a promise, offer, or grant a representative of a legal entity¹ (including associations, NGOs, foundations, among others) an undue advantage or benefit - for themselves or for a third-party - as compensation for making or omitting an act on their favor (favor of the person making the promise or a third party) in the acquisition or commercialization of goods or merchandise, in the contracting of commercial services, or in commercial relations. Those who accept, receive, or request such undue advantage or benefit also incur in this practice.
 - **Bribery:** the benefit granted to a public official (as a result of an act of Corruption of public officials) or to a private official (as a result of an act of private Corruption).
 - **Gift:** a present that is given or received for free voluntarily or as a custom. It is given in the form of goods or services as a symbol of friendship or appreciation, or to promote good personal, professional, and commercial relationships. Gifts include, but are not limited to, promotional items, food baskets, consumer vouchers, tickets for sports and cultural events; airline tickets and any other item of value that is granted to an individual or group of people where the host is not present.
 - **Entertainment:** any courtesy granted to third parties for their personal enjoyment with the purpose of initiating or encouraging a **commercial** or professional relationship. This includes, but is not limited to, events, meals, business meetings, training, conferences, trips, or others in which the host - or a third party designated by the host - is present.

¹ Please note that the concept of "representative" includes every partner, shareholder, manager, director, administrator, legal representative, proxy, employee, or adviser of the legal entity.

- **Third parties:** the persons, clients, or companies that provide the Company with goods and services, including customs agents, lawyers, tax advisors, consultants, agents, fund-receiving organizations, or others.
- **Public official:** any person who provides services in Public Administration entities, at any hierarchical or functional level, whether appointed, hired, designated, trusted, or elected to perform activities or functions in the Public Administration. For such purposes, the legal regime of the entity in which they provide services or the labor or hiring regime to which they are subject will not be relevant.

5. Acts not tolerated in the Company

The Policy prohibits the following acts:

5.1 Fraud

The Company requires compliance with the applicable accounting standards and prohibits the preparation of records, documents, or reports that do not reflect reality, as well as the destruction or improper tampering thereof.

Some examples of Fraud include:

- Improper tampering or alteration of revenues, creating the appearance that the Company performed in a manner that does not correspond to reality.
- Improper tampering or alteration of expenses to avoid taxes, distribute less profits, manipulate profits, present a better performance, among others.
- To improperly and inconsistently adjust the Company's supplies to manipulate the net profit, to demonstrate a better performance, among others.
- Improper alteration of bonuses in salary and wage payrolls, recording of advances, or recording of vacations.
- Improper tampering or alteration of Company information.
- Physical appropriation of goods, without justified consent, by the Company.
- Appropriation of monies, securities or similar, even if only temporarily.
- Performing unauthorized expenses, for own benefit or benefit of third parties.
- Illegal appropriation of cash, certificates, inventories, or fixed assets, evading Company's controls and procedures (for example, fraud in acquisitions or payroll).
- Illegal use or theft of trade secrets.
- Taking advantage of funds, securities, materials, or other assets for personal benefit and/or benefit of a third-party.
- Destruction, removal, or improper use of the Company's assets.
- Improper behaviors in the handling or reporting of monies, financial statements, or any type of Company information.

Any appropriation, use and/or misuse of Company's assets for personal purposes is also prohibited; including, but not limited to, movable or immovable assets (for example, use of equipment or vehicles for family or other work purposes), as well as appropriation and/or use of securities in any of its forms, such as: theft, fraudulent disbursements (for example, bogus employees, payments to non-existent companies, personal purchases) or alteration of reports to conceal irregular appropriation.

To avoid the occurrence of these acts, among other measures, it will be necessary to:

- Keep books, accounts, and records that accurately reflect all operations and cash withdrawals in the Company.
- Implement internal audits that identify the risk points of the accounting process.
- Register operations according to generally-accepted local accounting principles and international financial reporting standards.

Alleged cases of falsification of records, reports, or other financial information shall be directly reported to the Audit Committee.

5.2 Misuse of position

The Company does not tolerate abusing the power of roles or means to obtain economic or other benefits, such as:

- Disclosing the Company's confidential information to third parties.
- Financially profiting as a result of knowing privileged information.

Likewise, it is strictly forbidden to accept or request personal benefits of material value from contractors or suppliers, which may be understood as having the purpose of being an incentive to perform an act that goes against their responsibilities in the Company and its policies, such as per the Corporate Policy for Gifts and Entertainment. All gifts, entertainment, or donations to private entities must be made in their name, following the provisions stipulated in both the Corporate Policy for Gifts and Entertainment, and the Corporate Policy for Donations, Sponsorships, and Auspices.

5.3 Corruption

Pursuant to the provisions of the Ethical Commitments Guide, the Company's policy is zero tolerance for corruption in the performance of its business activity, both in the public sector (Corruption of public officials) and in the private sector (Private Corruption). No objective justifies any behavior outside the ethical principles that guide the Company's activities. Therefore:

- Bribery is not tolerated in the Company.
- It is forbidden to incite a public official, whether local or foreign, to commit illegal or unethical acts, as well as to help or allow them to violate the rules. Specifically, no member of the board, Company employees, or third-party acting on their behalf shall offer, promise, or give any object of value or other advantage to them in order to obtain, retain, or secure any business, personal benefit, or for the Company. Such favors or advantageous objects include, but are not limited to:
 - Favors (e.g. personnel recruitment)
 - Gifts and entertainment
 - Purchase of goods and services
 - Political contributions
 - Shares
 - Discounts on products
 - Assuming or forgiving debts
 - Others
- The Company's relationship with its customers and suppliers is based on legality, efficiency, and transparency. Ethical and responsible behavior is one of our pillars of action. As such:
 - a) No client or supplier shall directly or indirectly offer or grant, in the context of the business activity developed for or on behalf of the Company, gifts, presents, or other advantages - such as those indicated in the preceding item - to public officials with the objective of obtaining favorable treatment.
 - b) Company clients and suppliers must not offer or grant any employee any type of benefit - nor should the employee receive them - with the objective of being favored in the acquisition of goods or in the contracting of commercial services.
 - c) Likewise, no employee shall offer a Company client or supplier any benefit with the objective of achieving a commercial agreement.

6. Fraud prevention activities

The Company is committed to establishing and maintaining a system of internal controls that provides reasonable assurance of compliance with this Policy. That is why we must all contribute with the execution and compliance, as applicable, of the following procedures:

- Development of ethical culture and commitment, giving a clear message of zero tolerance to fraud, misuse of position, and corruption.
- Development of risk management in the Company by means of establishing monitoring mechanisms that allows the development of practices for the continuous improvement of specific procedures and controls.
- Constant training in policies and processes that strengthen the Company's ethical culture and position against fraud and corruption, as well as the implementation of other related policies.