



CONDUCT AND ETIC CODE



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1. INTRODUCTION

BIDDLE INC SAC always aims for people's wellness and promotes the building of a better future through the solidification of each BIDDLE 's employee principles.

We are convinced that principles are a fundamental part of our bases. This code pretends to add a continuous improvement, guiding our behavior to the maximum respect for human rights, reducing to its minimum the impact on the environment generated by our operations, and using our influence so all our partners, suppliers, contratists, stakeholders, and collaborating companies have a demanding performance like ours.

BIDDLE needs to build trust and solid relationships, inside or outside the company, having always present our principles, customer orientation, commitment, and personal growth. Based on this, we provided practice guidelines to our employees so they can take etic and professional decisions according to our principles.

BIDDLE INC looks to create value, that's why we must show correct behavior and fulfilling this code so we can be a solid company based and recognized by our principles, so we can generate trust with our stakeholders and society.



2. REACH OF THE ETIC AND CONDUCT CODE

The present Business Etic and Conduct Code will be adopted by the Directors, Managers, Employees from BIDDLE, allied companies, contratist, suppliers, customers, communities, and other stakeholders. To adjust their actions to our corporate principles and what is established in this document.

Our etic code and business behavior focus on healthy and transparent competition in a legal business that respects the current laws that are applied in the national and international territory where we operate.

3. OUR VISION, MISSION, AND CORPORATE PRINCIPLES

VISION

Be the best construction company and integrated services in the energy and mining sector.

MISION

We are a company focused on construction and integrated services to the energy and mining sector, looking for the satisfaction of our clients through innovative processes and committed employees with profitable management and sustainable development.

PRINCIPLES

Integrity

Customer Orientation

Commitment

Personal Growth



4. TERMS AND DEFINITIONS

- 4.1 Client:** Any natural or legal, national or foreign person that has a commercial nexus with BIDDLE that requires or receives goods or services from our company in exchange for compensation.
- 4.2 Employee:** Any natural or legal person that develops permanent activities for the company. This includes dependable personnel, shareholders, directors, legal representatives, managers, proxies, and in general all the organizational structure.
- 4.3 Consortium:** Companies or entities associations that have a common interest in participating jointly in a project or important business.
- 4.4 Financing of Terrorism:** Felony specified in the Legislative Decree N°25475, that consists in the provision, contribution, fundraising, or giving economy resources or financial services to commit any felony expressed on Legislative Decree N°25475
- 4.5 ML/FT:** Money laundering/ financing terrorism
- 4.6 Money Laundering:** Felony specified in Legislative Decree N°1106 which consists of the process of hiding the origin of illegal money, goods, and profits that come from other felonies like corruption, drug dealing, tax evasion, etc, usually by operations in which one or more natural o legal personas make multiple transactions. In other legislations, this felony is named "money laundering" "money whitening", "capital legitimation", etc.
- 4.7 Compliance Officer:** Natural person designated by BIDDLE responsible for monitoring the correct implementation and operation of the prevention of money laundering and financing terrorism systems. This person connects BIDDLE with the UIF-Perú.
- 4.8 Bounded SPLAFT:** Bounded prevention system in money laundering and financing of terrorism



- 4.9 Unusual Transactions:** those operations of civil, commercial, or financial nature realized or pretend to be realized, which their characteristics don't have a relation with the economic activities of the client, and are outside the current normal parameters of the market or don't have evident legal bases or present characteristics or alert signs defined by the obligated subject.
- 4.10 Suspicious Transactions:** Any relevant information about the assets, liabilities, or other resources management that don't have a relation with the economic activity, that can lead to suspect that there's using resources from criminal activities or destined to finance them.
- 4.11 SBS:** Superintendency of Banking, Insurance, and Private Pension Fund Administrators.
- 4.12 Obligated Subject:** natural or legal persons that must implement a system with politics and procedures to prevent the money laundering and financing of terrorism including the referral of information concerning suspicious or unusual activities, detected during the course of their activities. For the present Conduct Code, BIDDLE INC will be considered as the obligated subject.
- 4.13 UIF-Perú.-** Financial Intelligence Unit of Peru, specialized unit of the Superintendency of Banking, Insurance, and Private Pension Fund Administrators.

5. ETIC PRINCIPLES

BIDDLE INC and its employees should act in their activities under the following principles:

5.1 Respect and Compliance with the Norms

In compliance with the norms that regulate the company activities, adapting their behavior towards respect to the Politic Constitution of Peru and the current legislation in the fight against money laundering, and financing terrorism, as well as this Conduct Code and the Manual to prevent Money Laundering and Financing of Terrorism.

5.2 Probity

Performing its functions with responsibility and honesty, and looking that BIDDLE INC will not be used in money laundering activities or financing of terrorism.



5.3 Confidentiality

Guaranteeing the information confidentiality and hiding the identity of the Compliance Officer, as the law requires, and the Reports of Suspicious Operations (ROS) that it communicates to the SBS through the UIF-Peru.

5.4 Equity

Acting with respect and justice in their internal relations and also with the clients, suppliers, public organisms, and private entities as well as the SBS through the UIF-Peru.

5.5 Suitability

Guaranteeing the technical and moral aptitudes in the development of their activities taking advantage of the training opportunities for the due compliance of their functions, especially in a special subject money laundering and financing of terrorism prevention.

5.6 Impartiality

Evaluating with objectivity the information or disposition for the detection of unusual or suspicious operations showing independence in their links with people and institutions.

5.7 Veracity

Expressing with truth and in their activities development and compliance of their functions as well as with the clients, suppliers or third parties.

6 COMMITMENTS AND DUTIES

It must comply with the homework established by the law, its regulation, and other applicable standards putting special diligence in:

6.1 Directors, Managers, Employees

> Duty to inform

Pay special attention to the detection of unusual operations and in the prevention or detection of suspicious operations, informing the UIF-Peru through the Suspicious Operations Report (ROS) when appropriate according to what is established in the law, its regulation, and other applicable provisions in the field.



➤ Duty of Reserve

Under responsibility, BIDDLE INC and its employees are prohibited from bringing to the attention of any other person, entity, or organism, under any means or modality any information requested by the UIF-Peru or has been provided according to the law unless a requirement of the judicial body or competent authority according to the law.

➤ Duty of Registration

Register the operations that are performed, without any exclusion, in a precise, complete, and chronologic way, according to the established amounts in the Special Rules for the prevention of ML/TF, preserving them in the legal deadline and putting them in the disposition of the UIF-Peru in the way the deadline is determined.

6.2 The Clients:

The relationship with our clients is based on our integration principles, customer orientation, compliance, reliability, efficiency, and professional team effort to fulfill beyond the contract requirements.

We considered all of our clients as strategic partners. Exceeding the expectation of our clients, mainly in terms of quality, efficiency, and deadlines based on continuous improvement. All BIDDLE INC members are orientated to our intern and extern clients showing always a service and empathy attitude to attend to their needings in our different business lines.

All the relations with our clients will be realized in a transparent and trustable environment and under any motive, any member from BIDDLE INC could offer wrong information, ambiguous or lax.

6.3 Shareholders and Strategic Partners:

We commit to making every effort to secure optimal profitability, increase the value of capital, protecting their assets and their prestige.

The relations with the companies from BIDDLE INC Group guarantee not to favor any shareholder in any way. Also undertakes the development of a continuous dialogue culture with all the holders.

Shareholders and strategic partners will receive the same treatment regardless of the number of shares or participation value or establishment partnership.



6.4 Employees:

All BIDDLE INC employees must comply with and know the laws, rules and etc, and conduct codes and the corresponding standards of their area. That's why our workers are our first asset in the company.

For this reason, the company's relationship with the employees is based on autonomy, mutual respect, and the feeling of permanence, identity, and company pride.

The professional development of our employees is based on meritocracy, performance, and other factors related to the responsibility of their charge so they can have a race line in the company.

Leaders, work teams, and other members of the company must share information that will contribute to the development of others.

Those employees that have the mission to manage and direct work teams have additional responsibilities like:

- Looking out for the people that are under their responsibility, they must know, understand and comply with this.
- Lead the team with the example, their behavior must be the following model to their teammates.
- Generate an appropriate working environment of collaboration and fellowship.

The working conditions are communicated transparently and clearly to the workers, this includes wages, evaluations, and other things related to the company's policy.

6.5 Communities and Environment

We have a great conscience of our social responsibility of improving the life quality of in the communities where we operate.

We promote a culture based on environmental care that is aligned with the principles expressed in our quality policies, security, occupational health, and environment. We moved this compromise to our employees, suppliers, and communities.

BIDDLE INC SAC develops its activities without interfering, conditioning, or influencing political parties and public workers.



6.6 For information:

Our company is compromised to transmit in a transparent, clear, precise, and truthful way the information so it can be used for public diffusion. Also, the employees will be responsible for the documents that they emit and subscribe to in the exercise of their duties inside and outside of the company. However, they can only emit declarations (social media, in others) or subscribe to documents and other similar activities outside BIDDLE INC or those who have permission from the general manager.

Employees must maintain the confidentiality of the information even if it is not classified as reserved. This requirement includes the information shared in oral, written, and electronic media, recordings (sound/video), and images, in others ways.

6.7 Interest Conflicts:

The company recognizes and respects the personal financial activities of the employees.

Employees must avoid the business, financials, and familiar relations that can generate conflicts between their particular interests and the company ones.

None of the employees must act as a middleman or third-party agent in the relations of our company and cant have professional activities out of the group that can generate an interest conflict or interferes with their performance.

Interest Conflicts appear when the personal interest of an employee directly or indirectly is opposite or can enter into a collision with the company's interests and interfere with the compliance of their duties and professional responsibilities.

We hope that our employees act fairly and honestly, always according to the company objectives.

6.8 Commercial Practices:

BIDDLE INC is ruled concerning the current laws, showing transparency in our commercial activities. All the things won by the bidding process must be formalized in a written document and accounting documents must belong strictly to the reality of the services that we offered.



The company emphasized that one of its principles is integrity and rejects any possibility of payments to obtain contracts or extraordinary benefits that morally do not correspond. This is extended to our employees, who are prevented to accept any payment to accept a contract, supplier, subcontractor, or company service request. Our company is proposed to be the leader in integrated services for the petroleum, mining, and energy sectors and the diverse Peruvian economic activities with international reach.

6.9 Suppliers:

The suppliers are independent organizations, but they are involved in the value chain, they must maintain minimal conduct guidelines oriented to a reciprocal benefit.

BIDDLE suppliers must comply with the currently applicable law, avoiding any conduct that breaks the law or not, can harm BIDDLE's reputation, and produce adverse consequences for the company and its environment.

The responsibility of respecting the human rights of the supplier requires that he must avoid activities that provoke or contributes to the construction of negative consequences in human rights term for BIDDLE employees and the company itself.

Suppliers must maintain in all moments an etic behavior that allows them to establish legitimate and productive relations with their suppliers and the companies that they work with. So it must act with honesty and integrity in all its commercial relations.

The supplier will not make, offered, or accept with a cause in the contraction with BIDDLE, any payment in metals, species, or any other benefit from any natural or legal entity to obtain or keep a business or advantage position for the company or for a third party, that could generate an interest conflict between the suppliers or third parts and BIDDLE.

The supplier must perform its activities in a friendly way to the environment, so it can reduce its negative effects, according to the current laws. For this purpose, the supplier must know and enforce their employees and subcontractors all the health, security, and environmental standards from our company.

The supplier must respect the Confidentiality Policy principles on the information that they have access to because of their relation with BIDDLE in the performance of their professional activity.



6.10 Gifts, meetings, attentions, and courtesies:

According to the company policies, it cannot be given, to send or promise gifts, entertainment, or attention to the clients and suppliers.

No employee can accept a gift, attention, favors, cash, or goods that can easily convert into money, for you or your family, and friends, and can be interpreted as an attempt to inappropriately influence a commercial result.

6.11 Return of Presents/Gifts:

Todos los regalos que sean recibidos por recepción deben ser reportados al oficial de cumplimiento para la posterior devolución formal a la empresa o persona que lo realizo y agradeciendo su gentileza.

All the gifts that are received by the receptionist must be reported to the compliance officer for the subsequent formal return to the company or person who made it thanking them for their kindness.

6.12 Corruption, money laundering, or illegal acts (terrorism and others):

BIDDLE is committed to fighting against corruption and reporting any suspicion of corruption or illegal acts.

BIDDLE rejects money laundering and financing terrorism. That's why we count on procedures and internal controls.

Participate in the fight against corruption or illegal acts reporting them to the Ethics and Compliance Committee.

6.13 Bribery and Extortion:

If an employee is suffering from blackmail or bribery in their working environment, they must report immediately to their compliance officer.

BIDDLE will not allow offers or receipt of bribes or any other improper payment to a third party or employee.

6.14 No Retaliation:

It will not be allowed any type of retaliation against any employee that in good faith, raises questions, informs actions that do not comply with the present Ethic and Conduct Code, Anty Bribery Policy nor against those who collaborate in an investigation of illegal acts.



6.15 Complaints Mechanisms and Queries:

The complaints and queries can be reported in the following media: emails, web pages, or in a closed envelope directed to the Ethics Committee and the Compliance Officer safeguarding confidentiality.

The email of the Ethics and Compliance Committee is: denuncia_etica@biddle.pe

The email of the compliance function is: oficialdecumplimiento@biddle.pe

The ethics and Compliance Committee is responsible for the tracking and treatment of the complaints and queries and if noncompliance with the Ethics and Conduct Code is presented an investigation process can be initiated.

6.16 Divuligation:

The Ethics and Conduct Code is available on our web page: <http://www.biddle.pe>

7 ETHICS COMMITTEE:

The Ethics Committee is an organ of BIDDLE INC, whose main function is to enforce the present Code and conduct necessary investigations to clarify the events. If an infraction is found, a sanction will be made according to the seriousness of the events.

The Committee complies with the labor of receiving any complaint about the knowledge of suspicious conduct or suspicious of an infraction that is considered incorrect, inapropieted or tempting for the company employees' interests. For this purpose, the employee regardless of his position or condition has the right to communicate these behaviors.

It should be noted that the reports or complaints of any situation have confidential nature and must be realized in good faith to the following email: denuncia_etica@biddle.pe

This procedure will not take more than 05 working days. Also, the procedure must guarantee the defendant's rights of defense.

The sanctions applied to the employees go from the admonition (written or oral) or the dismissal or termination of the contract, without damages from the pertinent legal actions (civils, judicial, or any other nature) in defense of the company and employee's interests.



8 BREACH OF THE DISPOSES OF THE ETIC AND CONDUCTS CODE:

The Non-Compliance with the dispositions in the Ethics and Conduct Code constitutes a punishable offense by BIDDLE INC if any of the employees commit what's next:

- Reveal the identity of the compliance officer
- Breach the procedures of the intern manuals established by BIDDLE INC, in matters of prevention, money laundering, and financing terrorism.
- Non-compliance or transgress the procedures, guides, and intern guidelines established by the obligated subject.
- Not to elaborate or elaborate out of time annual informs, registers, and reports that are in their functions.
- Unjustified non-attendance to the programmed training in a matter of prevention of money laundering and financing terrorism.
- Hide or pretend to stop the labor of the supervisor of supervisory visits organ.
- Exclude from the register of operations.
- Transgress the right of the reserve by bringing to any person, entity, or organism attention, under any means or modality, including the SBS, the fact that any information has been requested by the UIF-Peru or has been provided.
- Not communicating to the compliance officer about a certain suspicious operation of a client.

9 SANCTIONS:

En casos de faltas por soborno, lavado de activos o financiamiento al terrorismo las sanciones pueden incluir el despido y/o notificación a los organismos de fiscalización y/o a las instancias legales que corresponda.

The non-compliance with this Ethics and Conduct Code is considered a serious fault and it will proceed according to what is established in the Internal Work Regulations.

In cases of bribery, money laundering or financing terrorism sanctions can include dismissal and a notification to the inspection bodies or the legal institutions that corresponds.

A handwritten signature in black ink, appearing to read 'Aleksandar Korolija L.', is positioned above the printed name.

Aleksandar Korolija L.
General Manager
GGE-DES-13_V4
18/05/2022

