



CRIME PREVENTION POLICY

DECEMBER 2024

CRIME PREVENTION POLICY

Hunt Services Company S.A.C. (hereinafter the “Company”) carries out its activities in compliance with strict standards of excellence and ethics, including compliance with the Foreign Corrupt Practices Act (FCPA).

The Company conducts its operations in compliance with Peruvian regulations on the prevention and fight against corruption (both private and public), money laundering, terrorism, tax crimes, customs offenses, off-the-books accounting, cultural property crimes, etc. (hereinafter collectively referred to as the “**Crimes**”), including, without limitation: (i) Law N° 30424 – Law regulating the administrative liability of legal entities in criminal proceedings; (ii) the Regulations of Law N° 30424, approved by Supreme Decree N° 002-2019-JUS; (iii) Articles 241-A and 241-B, included in the Criminal Code in compliance with the provisions set forth in Legislative Decree N° 1385; (iv) Article 199 of the Criminal Code, (v) Law N° 31740, Law which modifies Law N° 30424, and (v) amending and supplementary legislation.

Thus, within the framework of the above-mentioned regulations, the Company has decided to approve this Crime Prevention Policy (hereinafter the “**Prevention Policy**”), which aims to promote zero-tolerance against Corruption and any of the Crimes. As part of the Prevention Policy, the Company has also decided to approve the Crime Prevention System (hereinafter the “**Prevention System**”).

The Company has expressly agreed to have the Prevention Policy and Prevention System applied across all levels of the organization. The fulfillment of both documents is mandatory for its employees, representatives and managers, including its business partners and stakeholders, as the case may be, must assume the commitment to refuse any involvement in the Crimes and to adhere to the terms and conditions of the Prevention Policy. In this way, the Company creates an chain of ethical value in the market and in society.

Within the framework of this Prevention Policy, the Prevention System has established criteria, premises, guidelines, procedures and controls that are applicable within the Company to deal with matters related to prevention and fight against Crime, in compliance with the applicable legislation.

Both the Prevention Policy and the Prevention System have been endorsed by the highest-ranking Company authority (specifically, through the General Shareholders’ Meeting), which is absolutely committed to: (i) encouraging its correct implementation; and (ii) the prevention and fight against the Crimes.

This commitment and leadership are reflected in a clear, visible and accessible way through:

- The creation and promotion of a zero-tolerance culture towards the Crimes, as well as the rejection of involvement in the Crimes.
- A risk matrix and appropriate controls which allow the Company to prevent and mitigate the risks involved in the Crimes.
- Constant monitoring of the Prevention System by the Company to detect and prevent potential Crimes.
- A training program for managers, representatives and employees.
- A Code of Business Conduct with legal and ethical guidelines that are in line with the Company’s Prevention System.
- Approval of guidelines and/or mechanisms which recognize and promote the timely submission of whistleblower complaints to report any indication of the possible commission of a crime of corruption, in a confidential and safe manner, protecting whistleblowers and without fear of reprisals.
- Preservation and filing of documentation evidencing the implementation and enforcement of the Prevention Policy and Prevention System, by carrying out internal and external activities.

Finally, it should be noted that the Prevention System has been designed according to the provisions set forth in the Regulations of Law N° 30424, which were approved by Supreme Decree N° 002-2019-JUS, as amended.