



# CRIME PREVENTION POLICY

## VERSION III

(JULY 2025)

# CRIME PREVENTION POLICY

**Hunt Oil Company of Peru L.L.C., Sucursal del Perú** (hereinafter, the “**Company**”) performs its activities in compliance with strict standards regarding excellence and ethics. These standards include compliance with the Foreign Corrupt Practices Act (FCPA).

Moreover, the Company carries out its activities in compliance with the prevention and fight against corruption in all its forms, both public and private, money laundering, financing of terrorism, terrorism, tax offenses, customs offenses, parallel accounting, offenses against cultural heritage, prohibited financing of political organizations, offenses against the public administration, offenses against public faith, property crimes, cybercrimes, offenses involving the unlawful issuance of checks, and fraud, among other related offenses. Hereinafter, the foregoing offenses will be jointly referred to as the “**Crimes**.”

The prevention of and fight against the Crimes will be conducted by the Company in accordance with the corresponding regulations in force, including but not limited to: (i) Law 30424, which regulates the administrative liability of legal entities in criminal proceedings; (ii) the Regulations of Law 30424, approved by Supreme Decree 002-2019-JUS; (iii) articles 241-A and 241-B included in the Criminal Code according to the provisions in Legislative Decree 1385; (iv) Article 199 of the Criminal Code; (v) Law 31740 and its amending and supplementary regulations; as well as (vi) additional regulations that, in the exercise of self-regulation, the Company may have decided to include as part of its commitment to prevent the commission of the Crimes. Hereinafter, all of the foregoing will be referred to as the “**Crime Prevention Regulations**.”

As a result, within the framework of the abovementioned Crime Prevention Regulations, the Company has decided to approve the Crime Prevention Policy set out herein (hereinafter, the “**Prevention Policy**”), whose purpose is to promote zero tolerance for the Crimes (including, but not limited to, corruption) and for any activity that may endanger or violate our internal regulatory framework related to this document. In turn, as part of the implementation of the Prevention Policy, the Company has decided to approve the Crime Prevention System (hereinafter, the “**Prevention System**”).

The Company has expressly agreed that the Prevention Policy and the Prevention System will be applied across the organization and will be mandatory for its employees, representatives, officers, and directors, as well as, where applicable, for its business partners and stakeholders, who must commit that they will reject the Crimes and adhere to the terms and conditions set out in the Prevention Policy and the Prevention System. This way, the Company creates an ethical value chain in the market and in society.

Within the framework of this Prevention Policy, the Prevention System establishes the criteria, premises, guidelines, procedures, and controls that govern within the Company regarding matters related to the prevention of and fight against the Crimes, in compliance with the Crime Prevention Regulations and the applicable internal regulations.

It should be stated that both the Prevention Policy and the Prevention System are endorsed by the Company's top management, who are fully committed to promoting their appropriate implementation, application, execution, compliance, and continuous improvement in order to identify the risks of committing the Crimes and to manage them using suitable controls. To this effect, the Prevention Officer acts with autonomy and independence, relying on sufficient resources and direct reporting to the Prevention Committee.

This commitment and management are clearly, visibly, and accessibly reflected in the following:

- The creation and promotion of a zero-tolerance culture toward the Crimes, as well as their rejection.
- The existence of a Risk and Control Matrix, which enables us to manage, prevent, and mitigate the risks of the Crimes.
- The Company's ongoing monitoring of the Prevention Policy and the Prevention System in order to timely detect and prevent risks or the possible commission of the Crimes.

- Dissemination and training provided to the Company's representatives, administrators, directors, and other employees regarding the Prevention Policy and the Prevention System, as well as the other elements comprised in them.
- The Business Code of Conduct establishes legal and ethical guidelines, which are aligned with the Prevention System.
- Performance of due diligence, in accordance with the applicable procedure, on all potential business partners the Company may be relating with (suppliers, contractors, clients, and joint operation partners, among others related to the Company's activities), in order to make an informed business or contractual decision, implementing suitable controls to manage the respective risks.
- The approval of guidelines and/or mechanisms that recognize and promote the timely communication of any indication, suspicion, or certainty regarding risks or the possible commission of a Crime, with guarantees of confidentiality, anonymity, security, and protection of reporters, and without fear of retaliation.
- The conservation and filing of documentation evidencing the implementation, execution, and continuous improvement of the Prevention Policy and the Prevention System, through the Company's internal and external activities.

Finally, it should be noted that both the Prevention Policy and the Prevention System have been prepared and implemented in accordance with the Crime Prevention Regulations and the Company's internal regulations.

Non-compliance with this Prevention Policy may be subject to disciplinary measures, which may include termination of employment, in accordance with the applicable legal framework, without prejudice to any legal actions that may be applicable.

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# ACKNOWLEDGMENT OF RECEIPT

By signing this document, I state the following:

I have received and read the document entitled "**Crime Prevention Policy**" issued by **Hunt Oil Company of Peru L.L.C., Sucursal del Perú**. I understand its content and commit to comply with its terms and conditions.

I sign in acknowledgment:

Full name:	
Identity document:	
Position:	
Date:	
Signature:	