

CRIME PREVENTION POLICY

FLESAN GROUP

We are Flesan Group (which considers all the companies that make up it, its Directors, Managers and workers), a corporation with different business units in the field of construction, real estate, sale and lease of machinery and equipment. Our mission is to provide comprehensive solutions with high standards of quality and safety, with a culture based on principles of transparency, responsibility, and probity in all its actions, contributing to the growth of the country. In that sense:

We expressly reject and prohibit bribery, as well as any act that qualifies as money laundering, terrorist financing, corruption, collusion and influence-trafficking in any form, whether direct or indirect through an agent or other third party, whether in connection with a public officer or a private agency, and any conduct or action that may constitute a violation of current law.

For which we compromise to:

- Meet the requirements of the Crime Prevention Management System (SGPD by its acronym in Spanish) based on ISO 37001, and seeking its continuous improvement.
- Comply with the applicable legal framework for the prevention of bribery, money laundering, terrorist financing, corruption, collusion, and influence trafficking, such as Law No. 30424, its Regulations, and its subsequent amendments. For the purposes of definitions of money laundering and terrorist financing offences, it shall also apply SBS Resolution No. 789-2018 and its subsequent amendments.
- Promote ethical behaviors among our stakeholders according to the Code of Ethics and encourage the approach of concerns and complaints in good faith, based on a reasonable belief, in confidence and without fear of reprisals, guaranteeing confidentiality and facilitating an anonymous communication channel called www.flesanteescucha.com

In addition, for the maximum guarantee of independence and authority, a specific position has been designated within our organization chart, called the Crime Prevention Officer (EPD by its acronym in Spanish), this position is equipped with adequate capacity and status, with direct and rapid access to the Corporate Governance and Directors. This position will ensure the correct implementation, maintenance, and improvement of our SGPD according to our defined and agreed requirements. The EPD will have the role of compliance monitoring, thus ensure the independence of that position.

The EPD collaborates with all members of our Group, providing guidance on matters of ethical action and compliance.

Failure to comply with this policy will result in the application of sanctions covered by the Code of Ethics and the Internal Labor Regulations for workers or commercial disengagement with business partners as appropriate.

This Policy has been adopted in The Directory session of day 9 July 2020.

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Dusan Zlatar
Gerente General DVC



Alfredo Moyano
Gerente General Flesan del Perú