

<b>SCV Soluciones Integrales S.A.C</b>	<i>Anti-Bribery and Corruption Policy</i>	<b>Code : POL-01 Version : 01 Page : 1 of 1 Date: 07/31/2020</b>
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### ANTI-BRIBERY AND CORRUPTION POLICY

SCV Soluciones Integrales S.A.C. (hereinafter referred to as “Tradúcelo”) develops all its activities in compliance with the law and its ethical values of honesty and integrity, and rejects the use of **corruption practices or acts of bribery**<sup>1</sup>, stating in its policy to fight against corruption and bribery the following:

Prohibit the practice, promotion, or tolerance of acts of corruption and bribery, direct or indirectly, whether for its own benefit or that of third parties, in all its business operations. Moreover, to comply with all the applicable anti-bribery laws or regulations.

All direct and indirect collaborators and **business partners**<sup>2</sup> are responsible for the compliance of this policy. and they are expected to act with integrity, diligence, and impartiality in the decision-making process. Failure to comply with this policy or to incur acts that may violate it, will be grounds for disciplinary actions and complaints to competent authorities.

Likewise, Tradúcelo also reserves the right to take any action it deems appropriate against any entity or person who breaches this policy.

#### **Commitment**

- Do not influence the will or objectivity of third parties not related to Tradúcelo with the purpose to obtain a benefit or advantage using unethical or contrary practices against the Law.
- Do not give, promise or offer, directly or indirectly, any valuable good to any natural or legal person to obtain undue advantages for Tradúcelo.
- Do not allow any payment to expedite or facilitate the obtaining of favorable results in proceedings with public officials.
- Do not finance or show back or support of any kind, directly or indirectly, to any political party, its representatives, or candidates.
- Do not use donations to cover up improper expenditures.
- Do not request or receive unduly, directly or indirectly, commissions, payments, or benefits from third parties on the occasion of or with a cause in the investment, disinvestment, financing, or expenditure operations carried out by Tradúcelo.
- Pay special attention to cases in which there are indications of lack of integrity of persons or entities with whom we do business in order to ensure that Tradúcelo enters only into business relationships with qualified and reputable persons and entities.
- Promote internal training in material of prevention and fight against bribery and corruption.




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Carolina Villaverde Zevallos  
General Manager

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<sup>1</sup> Corruption practices or acts of bribery: Acts that seek to influence individual performance and seek the individual to act dishonestly. Crimes that include the intention of corruption with the purpose that both parties benefit dishonestly. To offer, promise, grant, receive, request, or accept an unjustified benefit, for oneself or for a third party, to unduly favor another in the acquisition or sale of goods, in the contracting of services, or in the commercial relations.

<sup>2</sup> Business partners: partners, contractors, providers, agents, distributors, non-operated joint ventures, and other collaborating companies.