

ANTICORRUPTION AND ANTIBRIBERY POLICY**UPDATED SEPTEMBER 2021**

As a key provider in Peru's moving sector, **EXPRESS TRANSPORTS S.A.**, has a zero-tolerance policy towards corruption in all its forms. To set an example for the industry, we adhere to the following principles regarding bribes and other illegal activity. This policy is considered binding for our contractors and providers, as well as consultants, employees, and other business partners who work with **EXPRESS TRANSPORTS S.A.**

For clarification purposes, we define bribery as the act of offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action. It is illegal, and a breach of trust. The inducement or reward offered, promised or provided in order to gain a commercial, contractual, regulatory or personal advantage.

Corruption and bribery or bribery intent, are unacceptable and go against the values of **EXPRESS TRANSPORTS S.A.**, which expect a business conduct subjected to the highest legal, moral and ethical standards.

Following this policy is mandatory for all our contractors and suppliers, as well as for our advisors and employees.

In the same manner, **EXPRESS TRANSPORTS S.A.** commits to behave ethically and legally, to abstain from any action that may damage the interests of its partners and clients.

EXPRESS TRANSPORTS S.A., is aware of all laws against bribery and corruption, and obeys and supports such laws.

According to the above, it is forbidden to:

1. Incur in any form of bribery, be it directly or through third parties (agents, advisors, etc.). This includes all personnel of the National Peruvian Police, whether officials, sub officials or administrative personnel; as well as Central, Regional and/or Local Government authorities.
2. Offer, make or authorize improper payments to any individuals, whether locally or internationally.
3. Induce illegal or improper acts on individuals, local or international officials.

4. Offer or accept money or any valuable object, as gifts, bribes or commissions, in connection to obtaining businesses or contract benefits.
5. Alter or falsify books or accounting registries in case of bribes or other illicit acts.
6. Participate in any other illegal act, specified or not in the Penal Code of Law, such as laws that typify crime, omission or deceit as a form of obtaining illicit benefits.
7. Disregard or cease to report the appropriate authorities of any sign of improper payments.

In order to fight against corruption, **EXPRESS TRANSPORTS S.A.** and its partners commit to:

1. Strictly comply with all established laws in the National Legislations whether valid or not.
2. Implement adequate policies and procedures to prevent bribery and other prohibited acts.
3. Implement and adequate internal control system of the Accounting System, as well as accounting registries and the system's documents.
4. Work under a total transparency policy, grant any information required, not just by a judicial order, but also for accounting audits, financial examinations, as well as necessary audits by clients and authorized third parties, like state institutions.

To achieve these objectives, **EXPRESS TRANSPORTS S.A.**, has developed program for training and teaching ethical standards in the provision of services to ensure our employees understand and abide by the above cited guidelines. All suppliers, employees and clients must immediately report any irregular or illicit activity to the General manager.