

ANTICORRUPTION AND ANTIBRIBERY POLICY

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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, cartels 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.

A cartel is an agreement, concerted practice or conspiracy among competitors to fix prices, submit collusive tenders, divide or share markets and, more generally, restrict competition. It is regarded as the most egregious violation of Anti-Trust laws and in most jurisdictions, it can lead to the imposition of significant fines as well as criminal penalties.

Corruption, bribery or bribery intent and cartels, 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.
8. Make contact, whether direct or indirect, with an actual or potential competitor or third party with the purpose of participating in cartel activity.
9. Propose or agree, directly or indirectly, formally or informally, with competitors, to fix prices, divide markets, clients or territories, or to rig competitive bidding processes.
10. Participate in commercial meetings in which competition-related issues are discussed. In case such subjects were raised during meetings, it must be immediately asked for the discussion to end, if not the meeting must be ended or immediately exited.

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, cartel activity 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.
5. Ensure that all correspondence, does not contain declarations that may be miss-interpreted by third parties or anti-corruption authorities.
6. Maintain an independent judgement in pricing or selling of any products and/or services.
7. Limit any information discussed during commercial negotiations, with or disclosed to competitors or third parties, to that which is strictly necessary for completing or evaluating a transaction.

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 and the corresponding authorities.