

**Farmex**
Vínculos fértiles

CODE OF CONDUCT & ETHICS

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Dear colleagues:

At **FARMEX**, we have always shown a special commitment to the quality of our products, and to integrity and professionalism in each and every one of the activities in which we take part.

Our organization has always been a good place for the work and development of our colleagues, as well as a symbol of trust for our customers.

This has allowed us to see sustained growth over the years, earning the recognition of our customers, shareholders and colleagues, as well as recognition within our business and social environment.

To have reached this stage would have been impossible without the support of all of you, who at all times have been willing to achieve, respect and reach the goals that we have set out to accomplish.

This **Code of Conduct** compiles all of the values and principles that have guided our individual and collective conduct, and underpins our firm commitment to abide by a code of ethics in carrying out our lines of business, respectful of human, individual, social, economic and environmental rights.

Likewise, this **Code of Conduct** shall be the guide and reinforcement of our Vision and Mission. The concept of “working alongside the farmer” goes way beyond the literal sense of the phrase; it seeks to establish fertile relations of trust and value that are sustainable over time.

Let us be an example of adherence to the values and principles that constitute and sustain the essential cornerstone of this **Code of Conduct**. The committed contribution of each of our colleagues will keep them alive and current as we adjust to the new demands of our times. With each of our actions, let us leave a mark so that our current colleagues and the generations to come will benefit from them and so make our organization ever greater.

Oscar Dibós Herrera
CEO - FARMEX

1. INTRODUCTION

FARMEX is a corporation whose reputation has been built on the efforts of all of its employees over many years of work, based on their commitment and adherence to sound values and principles that meet the highest demands of integrity, respect and professionalism.

This **Code of Conduct & Ethics** (hereinafter, **THE CODE**) is the expression of a series of principles of conduct that arise from and are inspired by traditional values in the ways of doing business and managing business projects that, in response to these high standards, must guide the work, the use of resources and the daily performance of every **FARMEX** employee.

THE CODE also aims to reflect the set of principles of ethical behavior and good business practices that are included in the OECD Guidelines for Multinational Companies, as well as in the United Nations' Global Pact and in the Universal Declaration of Human Rights.

This **CODE** applies equally to every member of our institution.

We also expect that our business partners, suppliers and third-party representatives will be committed to complying with the standards set out in this **CODE**; and, in many cases, we shall request these third parties to expressly accept every provision in this **CODE** in writing.

Every **FARMEX** employee is under obligation to acknowledge and comply with all of the applicable international and local laws, and with the present **Code of Conduct** and the guidelines that, in compliance with **THE CODE**, are issued by senior management at **FARMEX**.

FARMEX employees shall comply with rules and regulations to prevent tax fraud. Additionally, as **FARMEX** will choose employees or associated companies that share the same or similar values, care should be taken to ensure that they are all familiar with these values, as well as with the principles of conduct that they impose and that give them force, especially in circumstances when policies may include legal demands of mandatory compliance.

Nevertheless, the managers, executives and team leaders have additional duties over the rest of the employees in that, firstly, their conduct must become a benchmark in the compliance of the Code's principles on conduct and, secondly, they must support and promote corporate values and encourage compliance with the principles of conduct that should guide all activities at **FARMEX**.

Likewise, they also have the responsibility of disseminating, in the most effective manner possible, the contents of the Code as well as providing an immediate answer to any question their subordinates may have on the matter, fostering a work atmosphere that encourages the employees to freely ask questions and express any doubts that the Code might elicit.

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The Code of Conduct establishes the general principles and policies of action that should guide the decisions and performance of each and every person who is a part of **FARMEX**, given the level of social and individual responsibility that our professional activity implies.

Its content covers the issues and general situations that present themselves within the business and financial sector, as well as those cases that refer specifically to management and the operation of an organization.

However, this **Code of Conduct** does not cover all possible situations nor does it describe all of the specific rules that should be followed. Additionally, laws in some countries may establish stricter rules than those set forth here, in which case the stricter rule applies.

FARMEX employees must also bear in mind that wrong or improper actions by just one person may harm the image of the Company, and that violations of the law and of ethical principles can have serious and broad consequences for **FARMEX**, including:

- Financial penalties
- Administrative fines
- Compensation for damages
- Liens on benefits
- Debarment
- Termination of business relationships

Employees who violate the principles set out in this **Code of Conduct** also face serious consequences:

The following aspects should be considered when analyzing our **CODE**:

- This **CODE** reflects our values. The **CEO** of **FARMEX** has approved this **Code of Conduct & Ethics**.
- The **CEO** and the **General Manager** are firmly committed to guaranteeing that **THE CODE** is implemented in all of our operations and at every level. The waiving of any of these provisions must be made in writing and have the approval of the **General Manager**.
- This **CODE** may undergo changes. We are committed to regularly reviewing and updating our policies and procedures. In the latter case, we shall immediately report the changes to all of the employees in the organization.
- It is expected and required that all of the employees within our organization comply with all of the applicable laws and corporate policies, independently of whether or not they are expressly mentioned in this **CODE**.

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- We encourage questions. Do not hesitate to contact the **COMPLIANCE OFFICER** if you have any questions or doubts (to the email: ucn@farmex.com.pe and/or to the **COMPLAINTS CHANNEL at FARMEX S.A.**
- You must keep yourself informed of real or potential violations. You must immediately contact the **COMPLIANCE OFFICER** or use the **Complaints Channel** if you suspect that a violation of this **CODE** has been committed or could be committed. A failure to report constitutes in itself a violation of this **CODE** and can lead to disciplinary sanctions to the member of the organization.
- **We forbid reprisals.** No employee will suffer a reprisal, discrimination or any other detrimental work measures for reporting real or potential violations in good faith.

The **CEO of FARMEX S.A.** has approved and keeps current a **COMPLIANCE POLICY** that is supplementary to this **CODE**, and expresses the intention and commitment of our organization to the development of plans and Compliance Systems within our activities.

2. COMPLIANCE WITH THE LAW

At **FARMEX**, we are committed to complying with the law and the regulations that affect our organization and the manner in which we operate. We respect the highest standards of ethics and compliance with international laws and we expect that those who act on our behalf will behave in the same manner.

This is within the framework of Law 30424 as well as Executive Order 1352, which expands the administrative liability of companies. This **CODE** implements a culture of compliance within our organization to ensure internal supervision and a proactive prevention of irregularities.

This **CODE** is drawn up within the framework of **ISO 37001:2016**, related to a **CRIME PREVENTION MANAGEMENT SYSTEM (SGPD)**, as the ultimate expression of our interest in establishing a real and true culture of compliance.

3. LABOR PRACTICES

3.1. The Environment, Health and Safety

At **FARMEX**, we recognize our duty to satisfy the economic, ecological and social needs of present and future generations.

Our employees should work towards minimizing the environmental impact caused by our activities and the use of the facilities, equipment and means of work.

A respect for the environment implies, fundamentally, respecting the current laws on environmental matters related to the activities and geographical location of our facilities: minimizing the environmental impact made as a consequence of the activities undertaken at **FARMEX** facilities, particularly related to waste disposal and emissions

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into the atmosphere; prioritizing the criteria of prevention over those of correction; maintaining sensitization and awareness among all **FARMEX** employees on environmental matters; carrying out regular assessments of the environmental issues deriving from the Company's activity in order to ensure maintenance and continuing improvement of environmental management.

We believe that we can make an important contribution to sustainable development through:

- (i) The efficient use of resources
- (ii) A reduction in energy consumption and raw materials in production
- (iii) Waste reduction
- (iv) Waste recycling

Our employees must comply with all of the laws related to manufacturing, quality control, testing, storage, imports, exports or trading of products subject to documentation, as well as to the management of hazardous materials.

All employees involved in the construction and operation of our facilities must follow the local regulations and request and obtain the permits and authorizations necessary to operate our facilities.

3.2. Health and Safety

Work centers, factories and industrial facilities require careful planning and regular and systematic inspections and maintenance to prevent failures, accidents, emissions and considerable risks. Employees must be rigorously trained, provided with detailed work instructions and be appropriately supervised.

Maintaining the health of our employees is beneficial to everyone, both to employees and to the Company.

Employees must know and obey the health and safety protection rules in the workplace and, within their operations area, safeguard their own safety, that of other employees, customers, suppliers, associates and any and all persons who could be affected by **FARMEX** activities, within the terms provided by law.

Special care must be taken when working with potential sources of danger, since accidents may occur when we become less careful.

In the event of an occurrence, those in charge of the departments, sections units, or teams must report it immediately to the Company units responsible for health, safety and environmental protection.

3.3. Equal Employment Opportunities

At **FARMEX**, we are committed to providing equal opportunity to applicants and employees in every area of work, including hiring, training, promotion and compensation, and we shall not tolerate illegal discrimination for reasons of race, religion or belief, age,

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gender, disability, sexual orientation, nationality or any other conditions protected by applicable laws. All the members of the organization have the right to work and participate in activities sponsored by the employer in an atmosphere free of sexual harassment, harassment for ethnic, religious or other types, victimization, hostility and intimidation. Our policies demand compliance with all applicable laws against discrimination.

3.4. Substance Abuse

At **FARMEX**, employees are prohibited from using, selling, distributing, possessing or promoting illegal drugs while they are on the organization's premises, and prohibited from working under the influence of illegal drugs or alcohol.

Those who use drugs or alcohol while undertaking their tasks may also be reported to the competent authority.

3.5. Employee Privacy in the Organization

At **FARMEX**, we respect the privacy and dignity of our employees.

We compile and keep personal information on all employees that may be necessary to create and/or comply with the labor relationship, including the information required by law. Personal information consists of data related to the individual that can be identified only with those details or in conjunction with other data or information held by **FARMEX**

Our organization protects and limits access to the personal information of employees, according to the laws that govern their privacy.

No employee at **FARMEX** may have access to nor use records or information on other employees, unless they are authorized to do so and, in such a case, only to the extent legitimate business requirements demand, according to the applicable laws.

3.6. Threats and Violence

The safety of **FARMEX** employees is of the utmost importance.

Our employees may not commit acts of violence or other acts intentionally aimed at harming other persons or goods in the organization's facilities. Similarly, in the workplace, employees may not make intimidating or threatening comments nor behave in such a manner that may imply a threat to the personal safety or the goods of another person.

Harassment, violence or threats of violence must be reported immediately, according to the guidelines of this **CODE** and to the supplementary policies that **FARMEX** may establish, whether in the internal work regulations or in independent documents.

Whenever legally required, we prohibit, on the organization's premises or in the properties it may own or lease, the possession, concealment, use or transfer of firearms or other types of weapons, including knives, sticks, explosives or other devices used principally to cause harm.

4. PRACTICES FOR WRITING UP COMMERCIAL, ACCOUNTING AND FINANCIAL REPORTS

At **FARMEX**, we endeavor to maintain accurate and reliable corporate records that meet the applicable accounting standards and the established internal controls.

The payment of money, transfer of goods, provision of services or other transactions in the name of **FARMEX** are not approved without the appropriate supporting documents, nor when it is understood that part of those payments are used for purposes that are not described in the documents.

No funds or assets can be established for any purpose if they are not disclosed or documented.

The employees of **FARMEX** do not attempt to influence, confuse or interfere with the internal or external auditors that are hired to carry out audits on accounting books, records, internal procedures or controls in the organization's business.

All managers, directors and employees at **FARMEX** must:

- Present a reasonable (e.g., accurate, complete, objective, pertinent, timely and comprehensible) financial report and other types of reports that are relevant to accounting statements, according to the applicable laws, rules and regulations
- Respect and, where applicable, supervise and improve the **FARMEX** processes to maintain an effective internal control of financial reports
- Act in good faith, and with due care and in a responsible, competent and diligent manner, use the professional and independent bases of criteria and endeavor to present, at all times, the pertinent and reasonably available information in a timely manner to the management and other persons in charge according to the general accounting policies of **FARMEX**;
- Protect the confidentiality of the information obtained during the course of their work; and
- Use the confidential information obtained in the course of their work only for the commercial objectives of **FARMEX**, and not to gain personal advantages or enrichment.

5. PREVENTION AGAINST MONEY LAUNDERING AND TERRORIST FUNDING

At **FARMEX** we comply with the laws that prevent money laundering and funding of terrorism and that audit these matters, and we have made the determination to not establish relationships with persons or entities that do not comply with these laws or that do not provide sufficient information to comply with them.

6. CONFLICTS OF INTEREST

Whenever acting as an employee or other type of representative of **FARMEX**, the person must make their decisions in the best interest of the organization. A "conflict of interest"

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exists when a person's private interests interfere in some way with the interests of **FARMEX**

A conflict of interest is a situation in which the interest that should govern the acts of the **FARMEX** employee, that is, the interest of **FARMEX**, is influenced or can be affected by the self-interest of the employee in a manner that could alter the independence of the decision-making and could pose a potential risk of disloyal acts as a consequence of a conflict between personal interests and those of **FARMEX**.

There is also a conflict of interest when personal interests involve a person linked to a **FARMEX** employee.

In these circumstances, it should be understood that the person linked may be:

- i. Their spouse or de facto relationship
- ii. Their siblings, forebears or offspring
- iii. The siblings, forebears or offspring of the spouse or de facto relationship of the employee
- iv. The spouse or de facto relationship of their siblings, forebears or offspring
- v. The aunts, uncles, cousins, nieces, nephews, as well as the spouses or de facto relationship of these persons;
- vi. The companies or unincorporated organizations controlled or managed directly or indirectly by the **FARMEX** employee or by any of the persons indicated in the items listed above; and
- vii. The persons who act on behalf of a **FARMEX** employee, whether in the name of the latter or in their own name.

As a result, employees must bear in mind that their primary duty is to promote the interests of **FARMEX**. Conflicts of interest—including the simple appearance of a conflict of this nature— must be avoided.

Whatever relationship or activity that might influence, or have the appearance of influencing, the performance of duties, responsibilities and decisions of employees in the Company must be reported to the immediate hierarchical superior and to the Regulatory Compliance Unit as soon as the conflict situation is known, and the person must abstain in participating in the process or decision on the conflict that has occurred.

The areas and situations in which, typically, a conflict of interest may arise are:

Decisions regarding hiring of personnel: the individual interests or the relationships of a person should not influence decisions when hiring personnel.

Family relationships: Employees must report family relationships that they maintain or develop with persons who belong to or are about to join the **FARMEX** staff.

Contracting suppliers or other business partners for FARMEX for personal purposes: if an employee wishes to make a personal order or other contract with a person or entity that already has a business relationship with **FARMEX**, and that employee is in a position to have direct or indirect influence over the business relationship between **FARMEX** and the supplier or business partner in question, the

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employee must notify their hierarchical superior beforehand and be given authorization by that superior before executing the contract.

Business relationships with third parties: business relationships with third parties must be established on the basis of objective criteria (e.g., price, quality, reliability, technological level, convenience of the product, existence of a lasting business relationship free of drawbacks). The signing of a contract, the continuation or termination of a business relationship with a third party must not be influenced by personal interests or relationships or tangible or intangible personal advantages.

The supply of products or the provision of services to **FARMEX** by companies that belong to or are controlled by **FARMEX** employees or their close relatives, are subject to strict supervision.

Use of assets owned by FARMEX: (e.g., equipment, merchandise, office supplies, documents, files, means of information storage, computer programs, etc.): Employees cannot use **FARMEX** assets for personal reasons or remove goods or products, whether material or immaterial, from the Company premises without express consent from their hierarchical superior. **FARMEX** employees expressly relinquish to **FARMEX** the exploitation rights of work they have created by virtue of the existing labor relationship. No Company information, program or document may be copied or removed from the company facilities without authorization. All employees must recognize the value of know-how, of business secrets and of industrial and intellectual property, and maintaining confidentiality of the information with which they work, including of know-how, business secrets and industrial and intellectual property and other intangible assets that are the property of **FARMEX** or third parties with whom it works.

Acquisition and sale of properties: The employees must not acquire, directly or indirectly, goods or rights held by **FARMEX** except if they are rights being offered by **FARMEX**, arranged under criteria of transparency and generality, or if they are acquired through a bid or auction or with **FARMEX** express authorization. Express corporate authorization is also required in the case of the sale to **FARMEX** of goods and rights owned by an employee or relative of an employee.

Use of the Internet and the email system: **FARMEX** provides access to the Internet and electronic communications for business purposes. The occasional, and only marginal, use of the Internet is permitted for personal reasons. This authorization may be revoked at any time. The use of the Internet for personal reasons must be strictly limited in its duration and must not interfere with the duties of the employee.

The use of email provided by **FARMEX** is for business purposes only. Email must not be used for personal reasons. The employee must also bear in mind that **FARMEX** can search through data from an employee's access to the Internet as well as their email for business control purposes.

Also keep in mind that the protection of information requires the use only of tools that **FARMEX** makes available to fulfill their duties as employees, given that the tools are safe. Other tools, such as personal email, do not guarantee the confidentiality, availability and integrity of information.

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Financing suppliers or customers: **FARMEX** employees are expressly prohibited from receiving loans, cash advances or financial advantages of any kind, on a personal basis, from **FARMEX** customers or suppliers.

External employees: **FARMEX** employees are prohibited from accepting employment in an external company — including as a consultant, advisor, member of the Board of Members or Board of Directors — or from establishing their own business, without prior consent in writing from their hierarchical superior. This applies especially in the case of jobs in companies that already do business with **FARMEX** or that compete or could become competitors.

Personal participation in political parties or other social or political institutions: **FARMEX** accepts the voluntary participation of employees in these organizations, providing that it does not interfere with the performance of their duties at **FARMEX**.

Freedom of expression of personal opinions of employees: When expressing their personal opinions in public, **FARMEX** employees must avoid any situation or insinuation that they are speaking on behalf of **FARMEX** or that their opinions express those of the Company.

Our CODE prohibits conflicts of interest. However, we recognize that it is not always easy to determine if there is a conflict of interest, and thus any employee that may find themselves involved in a conflict of interest must contact the **COMPLIANCE OFFICER** of the organization, to report conflicts or possible conflicts, by email to ucn@farmex.com.pe and/or via the **COMPLAINTS CHANNEL** at **FARMEX**.

7. POLICY ON GIFTS, HOSPITALITY, DONATIONS AND SIMILAR BENEFITS

This **POLICY** is a minimum compliance standard, applicable to all **FARMEX** employees, third parties and business partners.

At **FARMEX** we have zero tolerance towards bribery and we are committed to acting professionally, impartially and with integrity in all of our actions, wherever we operate.

Accepting gifts, presents, courtesies and other benefits may be a legitimate way to encourage good business relations but it is important to **never** use them to unduly influence decision-making processes or make others perceive that an illicit influence occurred.

The acceptance of gifts, presents, courtesies and other benefits must always be made according to law and the business practices of the location.

It is important that every possible precaution be taken when accepting gifts, presents, courtesies and other benefits, to protect the reputation of third parties and of **FARMEX**, against allegations of illicit conduct and to ensure to not violate the laws governing crimes of bribery, money laundering and financing of terrorism.

In general, gifts, presents, courtesies and other benefits **must not** be requested of any person with which **FARMEX** does business, which influences suppliers, customers, business partners and government officials.

7.1. Staff Responsibilities at FARMEX

- Employees must make sure to read, understand and comply with this **POLICY** and any supplementary information issued in relation to said policy.
- The prevention, detection and report of bribery is the responsibility of everyone who works for **FARMEX**, or under its authority. It is required that every employee avoid any activity that might suggest or lead to a violation of this **POLICY**.
- Any irregularity or irregularities that are detected or suspected should be reported as soon as possible to the **COMPLAINTS CHANNEL** at **FARMEX**, if it is considered that a violation of this **POLICY** has been committed or could be committed in the future. For example, if a supplier or potential supplier offers something in order to obtain a competitive advantage from **FARMEX**, or if a customer indicates the necessity of a gift or payment to ensure a business deal.

7.2. Gifts, Presents, Courtesies and Other Benefits Given to Third Parties

Business gifts and invitations are widely accepted on a day-to-day basis in business and commercial activities. To give or receive invitations or promotional expenses is considered acceptable if:

- Related to events that have to do with the commercial activity.
- Given and received in good faith
- Permitted by law and local customs
- Offered and received according to the procedures described by the organization.

However, commercial invitations of any considerable value may also be used as a covert bribe.

All gifts, presents, courtesies and other benefits offered to third parties (government officials, customers, suppliers or any other business partner) should:

- Be reasonable and customary given the circumstances
- Not be motivated by the desire to inappropriately influence a government official, customer, supplier or any other type of business partner
- Be according to the rules of professional courtesy generally accepted in the country where they are offered and within the country where our branches operate
- Be offered openly and transparently
- Be offered in good faith and without expectations of reciprocity
- Be offered in relation to a recognized festivity or event in which presents are usually exchanged, in the case of gifts
- Be offered in relation to a commercial purpose that is legitimate and of good faith, in the case of travel and courtesies
- Not be offered to any government official, customer or supplier with a regularity and frequency that creates an inappropriate perception or undermines the purpose of this **POLICY**.
- Be in compliance with the local laws and regulations applicable to a government official, a customer or supplier.

7.3. Acceptance of Gifts, Presents, Courtesies and Other Benefits

At **FARMEX** we do **NOT** permit the use of gifts of presents of any kind that:

- Could influence the commercial relationship, whether with customers or suppliers, in a manner that that could create any advantage, difference in treatment, expectation of business, ability to influence or obligate (directly or indirectly) a procurement.
- Could affect any type of professional activity of the **FARMEX** employee to not perform their job independently and objectively, in the manner most favorable to the interests of **FARMEX**.
Could be contrary to any laws, regulations and/or rules, whether external and general or internal and specific to **FARMEX**.

Other supplementary guidelines, also of mandatory compliance, with regard to the acceptance of gifts by employees and directors of **FARMEX** are the following:

- Acceptance is prohibited of any type of personal financial assistance from a third party, unless it is from a financial institution acting within its ordinary business and without exceptional or singular criteria
- Acceptance of money in cash is prohibited
- Acceptance is not permitted, by an employee and/or any relative, of holiday travel or courtesies of any kind that are paid for by third parties with direct or indirect economic relations with **FARMEX**.

Any attempt of a bribe must be notified and reported through the **COMPLAINTS CHANNEL**.

8. CONFIDENTIALITY, USE OF THE ORGANIZATION'S ASSETS, INFORMATION AND TECHNOLOGY

8.1. Confidentiality

The protection of confidential information is fundamental to **FARMEX** success, including confidential information on employees, customers, suppliers or any other business partner of the organization. Several aspects of our business that allow us to compete effectively are based on information: our products, our plans and our strategies to provide services to our customers and satisfy their needs. Our information assets may include, for example:

- The names of customers and their product needs
- Patents, trademarks, licenses and other types of intellectual property
- Know-how and trade secrets, including, for example, registered equipment, suppliers and product formulas
- Ideas and future commercial concepts
- The characteristics of a product yet to be launched, launching programs and strategies
- Access passwords to the network and to systems
- Extraction rights on databases

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- Financial data not available to the public
- Information on acquisitions
- Forecasting of production, trading and sales
- Strategies on setting of prices and sales
- Sales personnel, suppliers and the **FARMEX** terms of agreement with them
- Prices of goods, materials and services purchased
- Registry of employees
- Organizational charts and organizational changes
- Operational strategies
- Security procedures
- Any other information of value, that provides competitive advantages and, in general, is not available to the public

We trust confidential business information to our employees and business partners so that they may do their job successfully. This confidential information is the property of **FARMEX**, and shall only be used for corporate purposes. Maintaining confidentiality of registered business information and trade secrets is essential for success and growth, as well as for maintaining our reputation and relationship with customers, suppliers and business partners.

We are committed to protecting confidential information in any format. Confidential information may be used or stored in various formats, including, for example, printed documents, cloud storage services, email, voice mail or recordings, or other instant message services, faxes, information on hard disks and other electronic storage devices, charts or graphic presentations and audio and video tapes.

The obligation to preserve information as confidential continues even after the work relationship with FARMEX has ended. If an employee decides to stop working for **FARMEX**, they may not disclose the confidential information to third parties.

8.2. Opportunities and Assets of the Organization

You are duty bound to promote the legitimate interests of **FARMEX** when the opportunity presents itself. Consequently, employees of the organization cannot:

- Take advantage of the opportunities that arise in the course of their work or through the use of the organization's goods or information
- Use goods, information or positions in the organization to obtain improper personal benefits
- Borrow or use the name, goods, commercial reputation, funds, data or other assets of **FARMEX** for your personal benefit or gain nor for the benefit of others; and
- Use assets of the organization for illicit or improper ends.

Because theft, negligence and waste have a direct impact on the organization's profitability and can violate the laws, it is expected that **FARMEX** personnel shall ensure that all corporate assets are used solely for legitimate commercial purposes. At the termination of the work relationship, all the organization's records and equipment must be returned according to the terms of the contract and the applicable laws.

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Any suspicion of fraud or theft must be reported immediately to the COMPLIANCE OFFICER at the email ucn@farmex.com.pe and/ or the COMPLAINTS CHANNEL at [FARMEX](#).

8.3. Nondisclosure of Records

FARMEX is committed to avoiding the improper use of information in the organization's records.

Considering that information on the organization's operations can be circulated swiftly and easily (by email, for example) the employees at **FARMEX** must take precautions to avoid the unauthorized or unnecessary dissemination of crucial and recorded information.

Access must be solely for commercial purposes and on a need-to-know basis. The information on customers and employees on file shall not be disclosed outside the organization without the permission of the latter and of the customer, except in the case of a court order, other legal processes or requests by government investigators or regulatory bodies, with the approval of the **COMPLIANCE OFFICER**.

8.4. Ownership of Ideas and New Products

The members of the organization who develop ideas, products or services while working for **FARMEX**, with the help of resources from the organization such as materials, information, equipment, technology, facilities or on their own time, shall proceed on the understanding that those elements are the exclusive property of the organization within the framework provided by law.

9. POLICY ON THE CORRECT USE OF ELECTRONIC MAIL OR E-MAIL

9.1. Introduction

Email has become the principal channel of internal and external communication in a business. As a result, in this section we define how we must use **FARMEX** email and how we must communicate with our customers, suppliers, colleagues and other employees.

9.2. Regulations

These regulations affect both email accounts with the **@farmex.com.pe** domain as well as messages using private email addresses (@gmail.com, @hotmail.com, @yahoo.com, etc.) addressed to **FARMEX**, or related. As an employee of the organization, you must take into consideration that:

- Each account with the **@farmex.com.pe** email is strictly for professional use and is associated to the person responsible for that account. Thus, you must not use your **FARMEX** email account to send, forward, or receive emails of a personal nature.
- You must not send or forward messages that threaten the security or integrity of customers, suppliers, colleagues and other employees of the organization. It is

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prohibited to send or forward derogatory, misleading or false messages that attack or are abusive of customers, suppliers, colleagues or other employees in the organization.

- Confidential information must not be disclosed, nor any information disseminated that discredits or could harm **FARMEX**
- The **IT Supervisor** must be informed when spam mail is received, or unsolicited emails, messages from a dubious origin (unknown or malicious users) or mail containing virus.
- You are responsible for cleaning your email in order to prevent saturation of the inbox, and to save information in your email that you consider important.
- You must not send, receive, download, copy or execute videos, music, graphics, or files that are unrelated to **FARMEX** activities.
- You must not use email in such a way so as to interfere with the normal performance of your work in the organization.
- Those who use the email account incorrectly are subject to sanctions according to the organization's **CODE**.

9.3. The Email Account

An email account is understood to be the assignment by **FARMEX** of:

- An email address in the form of **user@farmex.com.pe**
- An inbox (space on a disk) to store message
- A code word or password to privately access the account
- The possibility to send and receive messages within **FARMEX** and towards the Internet by using the assigned email address.

The email account is personal and non-transferable, and thus safe passwords must be used and the account cannot be shared. The offices or work groups that have an account assigned to them must appoint an authorized user to manage the account. Each person, or the authorized user, is responsible for the security of their account and of their password. The first time a user receives their account, they must change their password. For security purposes, the password should be changed at least every three months. To report problems, make suggestions or make any request related to email accounts or the email service in general, a call should be made or email sent to the IT Office.

9.4. Use of Email

- It is a corporate email rather than a personal one. Thus, it should be used for business matters of the organization and not for personal matters that are not part of the organization or the duties and responsibilities assigned by the organization.
- Appropriate language should be used in your messages.
- All information that is shared and communicated via this medium should coincide with the values of responsibility, honesty, respect, loyalty and tolerance
- Bulk emails may only be sent only by authorized personnel
- As personal identification, it shall be used only for means related to the organization, and is not authorized for subscribing to any media, page, blog, social networks and/or similar, except when authorized in order to formally represent the organization

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- The improper use of these guidelines will lead to a sanction. Each user is responsible before the organization for their use and, thus, assumes and accepts the sanctions that the institution may apply with regard to this issue
- Each and every user is supportive of the organization and should, therefore, report any infraction of these regulations or the poor functioning of email to the **IT Supervisor**, in order to contribute to its proper use and to exempt themselves of responsibility.
- Users must not read other people's email nor create or send emails in the name of someone else unless authorized or acting on their behalf
- Violations of the rights of any person or institution protected by copyright, patents or any other form of intellectual property are prohibited. These activities include the distribution and installation of software without the authorization of **FARMEX**.
- Do not reveal the code or password of your account, and do not allow its use by third parties for activities unrelated to **FARMEX**. This prohibition includes private persons.
- The use of email is prohibited for carrying out any form of harassment, slander, defamation, with the intention of intimidating, insulting or any other form of hostile activity, regardless of the language, frequency or length of the message.
- Activities that contravene the security of the systems or create an interruption of the network or the services are prohibited. Actions that contravene the security of the network include (but are not limited to) accessing data consigned to someone other than yourself, accessing an account of a server or application for which you have no authorization. For the purposes of the policies established herein, the term "interruption" includes, but is not limited to, capturing network traffic, creating a ping flood, spoofing packages, denial-of-service attacks (DOS), or falsifying information of routing and settings of equipment with the objective of exploiting the vulnerability of the systems.
- Users are obliged to report any form of irregularity or abuse of these services to the **IT Supervisor**, in order to prevent it from happening again or from happening to other users.

10. POLICY FOR THE CORRECT USE OF THE INTERNET

10.1. Introduction

The purpose of this Policy is to establish the guidelines that ensure the good functioning of the Internet.

Employees are expected to use the Internet responsibly and productively. Access to the Internet is limited to activities related only to work, and personal use is not permitted.

10.2. General Guidelines

FARMEX makes different computer tools available to its workers and employees and that should be used for professional purposes.

10.3. The Improper Use of the Internet

The unacceptable use of the Internet by members of the organization includes, but is not limited to:

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- Access to pages with illicit or pornographic content or that are offensive to human dignity: those that advocate terrorism, pages with xenophobic, racist or antisemitic content, etc.
- Use computers to perpetrate any form of fraud and/or piracy of software, films or music
- Steal, use or discover the password of third parties without their authorization
- Share confidential material, trade secrets or proprietary information outside of the organization
- Send or publish information that is defamatory to the Company, its products/services, employees and/or customers.
- Introduce malware into the Company network and/or endanger the security of the electronic communication systems of the organization
- Send or publish chain letters, requests or notices unrelated to the purposes or activities of the organization.
- Publish comments or send messages that are derogatory, misleading or false. Employees must communicate always in a civil and respectful manner, as professionals.
- Publish comments or send anonymous messages or with pseudonyms. Employees must always use their real name and identify themselves as employees of **FARMEX**.
- Create a group, page, blog, etc. that mentions **FARMEX** without prior approval.
- Use of social media in a manner that interferes with the normal performance of their work at **FARMEX**,

If an employee is unsure of what is the acceptable use of the Internet, they must contact the **IT Supervisor**.

10.4. Sanctions for Improper Use of the Internet

The equipment with access to the Internet may be subject to auditing in order to verify their correct use, and be carried out according to current legislation.

The improper use of these guidelines will be cause for sanctions. Each user is responsible to the organization for their use and, thus, assumes and accepts the sanctions that the organization may impose with respect to this issue.

11. COMPETITION AND FAIR TRADE

Antitrust and fair-trade laws prohibit agreements or deals between real or potential competitors to set or control prices, manipulate bids, boycott specific suppliers or customers, limit production and sales of product lines or assign markets and/or customers. Other laws prohibit price control of resale prices by distributors and retailers, discrediting a competitor, making false statements about the products of the organization, stealing trade secrets or offering to pay bribes or kickbacks.

These laws are to be firmly abided by and a violation thereof could entail significant fines to **FARMEX** and to you, as well as your imprisonment.

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According to our **POLICY**, we will compete robustly but fairly and comply with all of the applicable laws and regulations governing antitrust and the defense of fair trade.

As a general rule, we prohibit employees of the organization from discussing information that is not public with competitors and suppliers, including with members of associations in the industry, including the following subjects:

- Policies to fix prices, discounts, profits, terms of credit
- Other conditions of sale and/or purchase of goods and services
- Geographical sales areas
- Production or sales quotas
- Allocations of customers and bids for jobs or contracts

Questions regarding the appropriateness of proposed or real contact with competitors that include these topics should be directed to the **COMPLIANCE OFFICER** via email to [**ucn@farmex.com.pe**](mailto:ucn@farmex.com.pe) and/or via the **COMPLAINTS CHANNEL** at **FARMEX S.A.**

This **CODE** prohibits the theft of documented information, obtaining trade secrets without the consent of the owner or inducing the disclosure of documented information by previous or current employees of other companies; these actions are also illegal.

We must all respect the rights of **FARMEX** customers, suppliers and competitors, and deal with them fairly. No one during the course of their work for **FARMEX** may benefit unfairly from other people through manipulation, concealment, abuse of confidential information, false statements of relevant facts or other intentionally disloyal practices.

12. RESPONSIBILITIES AND DUTIES

12.1. CEO (Governing Body)

The **CEO** of **FARMEX** has a clear and inalienable commitment to the culture of compliance and ethics in the manner that business is conducted, and has set out the following actions and measures:

- Approval of a **COMPLIANCE POLICY**, supplemented by this **CODE**, which expressly prohibits any form of criminal behavior.
- Approval of this **CODE** as an extension of what is stated in the **POLICY OF COMPLIANCE**, which is intended to be a reference and a guideline of mandatory compliance by all members of our organization.
- Provision of all of the necessary resources to ensure the efficient operation of the **CRIME PREVENTION MANAGEMENT SYSTEM (SGPD)** of our organization.
- Regular reviews of the System's progress, its efficacy, as well as the necessary improvements to be undertaken.
- Receiving regular reports on the operation and occurrences of the System.

12.2. General Manager (Senior Management)

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In compliance with the **COMPLIANCE POLICY** at **FARMEX**, and with respect to legality, and the applicable legal provisions related to Corporate Criminal Liability, the **General Manager**:

- Establishes, defends and encourages as one of **FARMEX** fundamental values, that the actions of employees may always be in conformity with legal order, in general, and particularly in criminal law, promoting an appropriate culture of compliance, obeying and enforcing the express intention of the organization.
- Ensures the establishment of mechanisms to make effective **FARMEX** intention, expressed in the **COMPLIANCE POLICY** and in this **CODE** through the correct adoption, implementation, maintenance and continuing improvement of our **CRIME PREVENTION MANAGEMENT SYSTEM (SGPD)** through clear procedures, policies and processes, defined and designed to prevent and identify crimes or to significantly reduce the risk of them being committed, according to **ISO 37001:2016, Law 30424**, and the specific framework of risks derived from our activities.
- Provides the **CRIME PREVENTION MANAGEMENT SYSTEM (SGPD)** with the adequate financial, material and human resources for its effective operation.
- Regularly examines, at least once a year, the effectiveness of the **CRIME PREVENTION MANAGEMENT SYSTEM (SGPD)** amending it if necessary, when serious infringements are identified or when changes are made within **FARMEX** on the structure of control or in the activity undertaken.
- Ensures that the necessary resources planned for the correct operation of the System are available and being used effectively.
- Establishes internal processes to encourage participation and the report of any act or conduct that could be suspicious or criminal, articulating mechanisms to protect any **FARMEX** employee who cooperates in this area from any form of reprisal, discrimination or sanction.
- Aware of the complexity of the objective and the permanent change in context, the General Manager is committed to the continuing improvement of our **CRIME PREVENTION MANAGEMENT SYSTEM (SGPD)** encouraging all employees of the organization to participate with their proposals and suggestions to improve the ethical performance of our organization.

12.3. Compliance Officer

Accepts the functions and responsibility of the **Compliance Duty** acting as **COMPLIANCE OFFICER** entrusted with the supervision of the operation and execution of the **CRIME PREVENTION MANAGEMENT SYSTEM (SGPD)** being responsible for:

- Advancing and continually supervising the implementation and effectiveness of the **CRIME PREVENTION MANAGEMENT SYSTEM (SGPD)**
- Providing advice and guidance to personnel on the **CRIME PREVENTION MANAGEMENT SYSTEM (SGPD)** and on questions related to bribery
- Ensuring that the **CRIME PREVENTION MANAGEMENT SYSTEM (SGPD)** is implemented appropriately
- Reporting on the performance of the **CRIME PREVENTION MANAGEMENT SYSTEM (SGPD)** to the **CEO, General Manager** and to other compliance offices, as applicable

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The **COMPLIANCE OFFICER** personifies the position of maximum guarantor of the supervision, monitoring and enforcement of the compliance obligations in **FARMEX**, both inside and outside of the organization, for which they have sufficient resources available and the appropriate competencies, status, authority and independence.

12.4. Common Duties and Obligations

In order to prevent or, where appropriate, identify any irregular conduct that could occur in any of the hierarchical levels, it is mandatory that all **FARMEX** members report and denounce, through the procedures set forth by our organization, any possible risks of breach of the law, the **Code of Conduct**, or of any internal regulations or action protocol implemented and/or any action that could be considered unlawful or criminal.

All those in charge of areas must make sure that the members pertaining to their areas are aware of and apply what is established in this **CODE**, as well as of the processes, procedure and/or policies related to compliance that could affect them in the event of noncompliance thereof.

13. QUESTIONS AND DOUBTS

Do not hesitate to contact our **COMPLIANCE OFFICER** if you have any doubts or questions regarding the application of this **CODE** to your tasks.

If you have any doubts or become aware of possible violations of the **CODE** or of the organization's Policies, **you must** report them to the person in charge of compliance, via email to ucn@farmex.com.pe and/or **via** the COMPLAINTS CHANNEL at FARMEX S.A.

14. COMPLAINTS CHANNELS AND REPORTING CONCERNS

We have established procedures for:

- The confidential report of concerns and complaints filed in good faith by **FARMEX** employees, groups of interest and business partners, and of third parties, related to violations of this **CODE** and the **POLICY**.
- The reception, retention and treatment of complaints received by **FARMEX** on the violations of this **CODE**.

Bear in mind that you must report any real or potential violations. Not reporting them could lead to disciplinary sanctions. These reports should be made through the **Channel of Concerns and Irregularities** or through the **COMPLIANCE OFFICER** via email to ucn@farmex.com.pe and/or **via** the COMPLAINTS CHANNEL at FARMEX S.A.

COMPLAINTS CHANNEL

Website of the organization

<http://farmex.com.pe/nosotros/>

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I, the undersigned, hereby **DECLARE** that I have received from the representatives at **FARMEX S.A.**, a copy of the **CODE OF CONDUCT OF FARMEX S.A.**, with which I am familiar and understand in full. **THE CODE** besides including the values of the Company establishes the guidelines for internal behavior and style, guidelines for behavior towards society and nature, and a series of especially prohibited behaviors for employees and managers of the Company. It also governs the **Regulations Compliance Unit**, provides the communications channels for irregularities and is subject to the effective compliance of its content to the applicable legal provisions in force.

Signature:

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Names and surnames:

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Position:

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Date:

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