





# CODE OF ETHICS

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**LETTER FROM THE GENERAL MANAGEMENT**

Dear everybody;

We are pleased to introduced you the fourth edition of the FENIX Code of Ethics; document that collects the values and behavior that should guide our daily action and the decision making for all our collaborators and suppliers. When it corresponds.

Our Code of Ethics is becomming increasingly important due to our groups of interest and the society in general, have become more demanding everyday regarding the behaviour of companies and more specially, respect of the ethic and integrity with which we perform in our business.

FENIX has set a demanding goal in defining his purpose: “Contribute with best energy in the future of our country”. To be loyal with this compromise, we must adopt better practices and ethic standard in our gestion.

In FENIX this challenge is particular relevant, because the electric energy is a essential good and the key for both the country development and the quality of life of its inhabitants.

Although there is already a path traveled in this direction, we can’t let to examine in a critic manner each one of our actions and decisions, in light of the principles and guidelines set out in this Code of Ethics.


It is not enough to work with excellence and obtain good results, is equally important the way in what we obtain those results. This requires acting consistently and transparently avoiding conflicts of interest or dealing with them when we are facing them, emphasizing a long term and sustainable relationship that allows to generate spaces of trust with our clients, contractors, suppliers, shareholders, neighboring communities and public in general.

You are all invited to read our Code of Ethics and put it in to practice, always acting with integrity, with respect to others, in a fair and consistent way between what we declare and what we do.

Best regards,

**Juan Miguel Cayo**  
General Manager  
FENIX Power Perú S.A.

**Thomas Keller**  
General Manager  
COLBUN S.A

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## CODE OF ETHICS, CONTENT AND STRUCTURE

The code of ethics is a tool where we declare bussiness practices with which we are commited and what should be expected of us as collaborators of FENIX.

It also helps us to specify our values on a day-to-day basis, by translating these into behaviors and attitudes that make it possible to materialize our purpose.

This Code contemplates the following aspects:

- Our Purpose and Values.
- FENIX and its Collaborators.
- FENIX and its Contractors and Suppliers.
- FENIX and its Clients.
- FENIX and the Company.
- FENIX and the Environment.
- FENIX and Investors.
- Compliance with the Code of Ethics.

"THE CODE OF ETHICS INCLUDES THE PRINCIPLES OF INDIVIDUAL CONDUCT THAT IS EXPECTED OF ALL WORKERS AND COLLABORATORS OF FENIX."


## OUR PURPOSE AND VALUES

### OUR PURPOSE

Contribute with the best energy for the future of our region.

### OUR VALUES

- **Integrity:** We are transparent and consistent with our words and commitments. Respect for life and the dignity of people is a fundamental value.
- **Excellence:** We work oriented towards achieving results with a permanent sense of quality and responsibility.
- **Passion:** We are convinced that our energy is essential for the development of the country.
- **Innovation:** We seek creative solutions to face the risks and opportunities in our industry.
- **Collaboration:** We are committed to promoting teamwork and an incessant search for alliances that allow us to achieve mutual benefit.

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## FENIX AND ITS COLLABORATORS

### RESPECT, DIGNITY AND DIVERSITY

At FENIX we believe that diversity and inclusion add value to our Company. We are committed to promoting diversity, inclusion and respecting differences. We aspire for each of our collaborators to identify themselves and feel that they belong to FENIX, and that they contribute from their individuality and through collaborative work, to the objectives that we have proposed as a Company.

For this, we place special emphasis on the mutual respect of FENIX employees, through dignified, fair and non-discriminatory treatment, valuing and respecting diversity of race, sex, age, disability, marital status, association, religion, political opinion, nationality, ethnic origin or social origin.

Each one of us has the responsibility to contribute to the construction and maintenance of an environment free of discrimination at work, among ourselves, with our clients, suppliers and third parties in general.


### TEAM GROWTH

We promote team spirit in order to move forward together in meeting the objectives we have as a company. Each of our members contributes to the development of the company. That is why we value the proposition and generation of innovative ideas and collaboration.

### EXCELLENCE MANAGEMENT

We promote a commitment to excellence, based on efficiency, seriousness and professionalism in our actions.

We promote that our operations respect the high standards that the company has.

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## **INTEREST CONFLICT**

A conflict of interest arises when a collaborator misuses her contacts or her position in the company, for the benefit of her own interests, of immediate relatives or third parties.

It is the responsibility of each employee to avoid or notify any situation of potential conflict of interest, reporting such situation to their direct manager and the Head of Internal Audit.

## **USE AND CARE OF THE COMPANY'S ASSETS**

The use of tangible and intangible assets (cell phones, vehicles, computers, corporate image, among others) must be for the benefit of the fulfillment of the functions of each collaborator, respecting internal regulations and current law.

Each employee is responsible for the assets that are under their control, for which they must protect them from possible damage, misuse, loss, and theft.


## **COMMUNICATION**

We consider essential a fluid communication between employees, using the channels that the company establishes for this. We seek that each of the FENIX collaborators express their opinions, making them known effectively, so that the dialogue allows us to make transparent and informed decisions.

## **QUALITY OF WORK LIFE**

The success of our management depends on professionals who possess integrity, the necessary skills and demonstrate their enthusiasm in the tasks they carry out.

For this, we consider it a priority to achieve the best balance between family life and work, so we seek to implement in the best possible way, practices that allow strengthening the relationship between family and work, in a harmonious and effective way.

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## **HEALTH AND SECURITY**

We are committed to maintaining the safety of employees in our facilities. For this we provide the working conditions that allow us to function in safe and comfortable work environments, through compliance with current legislation and internal occupational health and safety standards.

No circumstance justifies assuming uncontrollable risks that threaten the safety and health of people, therefore we recognize safety as a collective construction based on self-care, promoting the implementation of programs and measures to prevent accidents that threaten the health of those who work in our company.

FENIX is committed to providing a work environment free of alcohol, tobacco and drugs.

## **CHILD LABOR**

We reject child labor in any of its forms and we do not maintain commercial relationships with supplier companies and / or contractors that do not comply with this principle.

## **PAYMENTS FOR FACILITATION**


We disapprove of facilitation payments, corruption, extortion, bribery, or any other misconduct that could be misconstrued as an attempt to obtain illegal consideration.

## **RECEPTION AND DELIVERY OF GIFT AND EVENTS**

The receipt of invitations or gifts from companies that have a current (or other) contractual relationship, current or potential, could generate obligations for those who receive them, therefore, as a general rule, it is FENIX's policy not to receive gifts or gifts, whose value individual is greater than US \$ 100.

If a collaborator receives a gift (including lunches or dinners) they must inform their immediate management to define how to proceed (accept, reject or define terms and conditions of participation), always giving priority to avoiding conflicts of interest and compromising the transparency and reputation of the company.

If you receive an invitation to participate in any training, conference or seminar, you must inform your immediate leadership to define the form of co-financing of said activity. In any case, FENIX must pay at least the tickets or stay associated with said activity.

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In relation to the delivery of gifts and gifts, you must follow the marketing and sustainability guidelines and strategies that FENIX has been handling.

The delivery of gifts and gifts to public officials in excess of the value of \$ 100 mentioned above and with the prior approval of the General Manager is expressly prohibited.

### **DEFENSE OF INTELLECTUAL PROPERTY**

We consider that intellectual property is a competitive advantage for our company, therefore, it is the responsibility of all collaborators to protect against loss, theft or improper use of any improvement or innovation that is developed for work purposes.

### **COMMITMENT TO THE STANDARDS**

We are committed to knowing and respecting the rules that regulate the Company, in the area that corresponds to the development of the functions of each of our collaborators.

### **DELITES PREVENTION MODEL**


All FENIX employees must know and apply the guidelines established in the Company's Crime Prevention Model.

## **FENIX AND ITS CONTRACTORS AND SUPPLIERS.**

### **CONTRACTORS AND SUPPLIERS**

Contractors and suppliers allow us to have the products and services necessary to develop our business. For this reason we look for companies that share our values and we foster relationships based on respect, honesty, excellence, respect for the law and transparency. We are convinced that they are indispensable for the results we need.



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## **EXCELLENCE**

Our contractor companies and those who provide us with products or services must exhibit levels of specialization and efficiency in activities within their competence. They must be selected carefully and hired properly. Any misconduct they carry out could damage the work or reputation of the company, shareholders and its collaborators.

## **FAIR AND EQUAL TREATMENT**

The relationship with those who provide us with products and services is based on mutual respect, objectivity and honesty. The decision to choose one company over another is determined by objective criteria related to the best results for FENIX. We always respect the agreements and recognize your right to fair compensation for the products or services provided.

## **SUPPLIER AND CONTRACTOR DEVELOPMENT**


FENIX promotes commercial relationships with those companies that provide products or services identified with the communities that host our operations when the conditions exist so that the goods and services involved can be supplied in a competitive and sustainable manner.

## **PROBITY AND TRANSPARENCY IN BUSINESS**

From the negotiation stage and until the end of the contractual relationship, the parties will maintain an irreproachable conduct, always acting with transparency and good faith. Both parties will endeavor to fully comply with the agreed commitments, always in compliance with the law and the spirit of the contracts.

## **SUSTAINABILITY**

We promote relationships that go beyond the scope of a particular contract, therefore, our contractors and suppliers must know and share the values and principles expressed in this Code of Ethics, and standards regarding respect for the law, safety, quality, care for the environment and social development and principles and rights of the worker.

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## FENIX AND ITS CLIENTS

### OUR SEAL

FENIX is a company that generates closeness through direct, collaborative and close relationships.

We are known for delivering security, operating with excellence to provide a reliable and safe service.

We add value in everything we propose and do.

We adapt to the needs of the environment, looking for innovative solutions, to provide the highest quality products and services.


### EFFICIENCY AND EXCELLENCE

Relations with our clients are transparent and responsible, always trying to comply with the commitments acquired and with the current law.

We are committed to providing a service of excellence and being efficient and active in meeting the requirements of our clients, including solving operational and administrative problems, with the people in charge of direct relationship with clients being responsible for providing an appropriate response, purposeful and continuous improvement.

### CONFIDENTIALITY

We safeguard the confidentiality of our clients. Their information will only be disclosed with their authorization, unless such information is legally required.

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## FENIX AND THE SOCIETY

### MUTUAL BENEFIT ALLIANCES

Working with the communities that host our operations is an opportunity to empower the people and companies that are representative of those communities. We promote long-term self-sustaining projects with high social impact in order to develop initiatives that create shared value. Specifically, we favor projects in the fields of education, quality of life and productive development.

### FREE COMPETITION

All FENIX employees must comply with and respect the current regulations on free competition in their relationships with clients, supplier companies and competing companies.

## FENIX AND THE ENVIROMENT


### ENVIRONMENTAL RESPONSIBILITY

We aspire to excellent management, promoting the responsible use of natural resources. We strictly observe compliance with our legal environmental obligations and our voluntary commitments, and we report our performance in a truthful, timely and periodic manner.

## FENIX AND SHAREHOLDERS

We watch over the interests of the shareholders of our company every day, in the development of their activities to meet the legitimate expectations of profitability of their investments.

This includes, when appropriate, the delivery of complete, relevant and timely information on all relevant aspects of the business to shareholders, to respective authorities such as supervisory and regulatory bodies, External Auditors and Risk Classifiers, among others, in accordance with current legal regulations.

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## COMPLIANCE OF THE CODE OF ETHICS.

### COMPLAINT CHANNEL

If a collaborator, supplier, client or interested public wishes to make a report of violations of the provisions of this Code of Ethics, they can do so through the following communication channels:

- Via web: Complaints form <http://www.FENIXpower.com.pe/lineaetica>
- Via e-mail: [lineaetica@FENIX.com.pe](mailto:lineaetica@FENIX.com.pe)
- Written route: In a confidential envelope addressed to:

Name: Head of Internal Audit

Address: Av. Antonio Miró Quesada 425 Of. 1203 Magdalena del Mar - Lima

In all cases, reports can be made anonymously. Likewise, all reports will be treated strictly confidential.

All complaints are managed by the FENIX Ethics Committee.

## APPROVED

This Code of Ethics was approved, in its fourth version, at the Board of Directors' meeting on April 29th, 2020.