

ANTICORRUPTION POLICY^{1 2}

ENGIE Energía Perú S.A. (the “Company”) is opposed to any form of corruption, regardless of the time, place or circumstance, having set itself to promote a corporate culture of integrity and compliance with legal and regulatory provisions. The main ethical document is the Ethics Code of Conduct and is the basis on which the Company's policies, codes of conduct, procedures and manuals are built, being its position on this matter very clear: “Zero tolerance for fraud and corruption”.

This Policy reflects the ethical principles established in the Ethics Code of Conduct: (i) Corruption and fraud: zero-tolerance, (ii) Compliance with laws and regulations, and (iii) Integrity and loyalty in our relationships with third parties. The Company has policies, procedures, codes and other documents dedicated to the prevention and rejection of fraud, corruption and, in general, of other illegal behaviors or behaviors that are contrary to the aforementioned ethical principles. Thus, the Policy is framed within ENGIE's Presentation of Integrity Referential that considers the highest international standards (UK Bribery Act, US Foreign Corrupt Practices Act and the French Sapin 2 law) and Peruvian law, which have served as the basis for the establishment of ENGIE's anti-corruption program.

The Policy applies to all Company employees, directors and officers. It also applies to business partners, contractors, suppliers, donation beneficiaries, among others.



¹ Updated on September 2, 2024

² ⓘ This document is a translation of the original version in Spanish and is for information purposes only. In case of any discrepancy between this English version and the original in Spanish, the Spanish version will prevail.

THE COMPANY:

- Has zero tolerance for fraud and corruption, rejecting any of these acts.
- Requires that the conduct of employees and third parties who may act on behalf of the Company be responsible, serious and in full compliance with the ethical principles contained in the Ethics Code of Conduct.
- Prohibits any practice that may imply a situation of connection in acts of corruption or that may reasonably generate accusations of corruption or where an interference in the judgment of the Company's interlocutor may be caused by illegal practices.
- Prohibits facilitation payments, understood as payments made to an employee of a public entity to speed up or expedite acts or procedures before said entity.
- Has a whistleblower channel managed by a specialized company, which is open internally and externally and allows receiving reports of irregularities and guarantees, if requested by the whistleblower, his/her anonymity.
- Has a policy on gifts, hospitality and technical travel aimed at preventing any type of corruption, conflict of interest or influence peddling. It provides a framework for transparency of practice by requiring information, declaration or prior approval as defined in the policy.
- Has a conflict of interest prevention policy that establishes the principles for identifying and managing potential or real conflicts of interest arising from the Company's relationships with third parties.
- Does not make any type of contribution or finance in any form (in kind or in money) to political parties, members of political parties or candidates.
- Periodically trains and sensitizes its employees on the content of the ethical principles, the Crime Prevention Model, the policy on gifts, hospitality and technical travel, the policy on prevention of conflicts of interest and due diligence policies for counterparties.
- Has an Ethics Committee comprised of members of the Company's Executive Committee that oversees compliance with the Policy. It also has an Ethics Officer who manages integrity issues.
- Has an Internal Work Regulation that foresees non-compliance with the Ethics Code of Conduct and other ethical provisions as a sanctionable offense.
- Places ethics, occupational health and safety, respect for human rights and the environment as pillars of its activities.

Lima, July 2023



El Mehdi Ben Maalla
Chief Executive Officer
ENGIE Energía Perú S.A.