

# Code of Ethics



We act with integrity



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## Act with Integrity

What should I consider in order to act with integrity?

It is evident that any document cannot foresee all of the situations that may occur; therefore, if you do not know what to do or how to act, ask yourself these simple questions:

Is my decision consistent with the Code of Ethics?



Does my decision reflect the Values and Policies of STRACON?



Am I prepared to be responsible for my decision? Can I justify it?



Will I be comfortable if my decision is disclosed within or outside the Company?

If any of the answers was “no”, Do not do it!



If you have any doubt, please contact your immediate leader before taking a decision/action.

## STRACON Listens

Is our official means to report any unacceptable or unethical behavior and is managed by our provider, EY. You can access STRACON LISTENS through the following ways:



Web: [www.straconteescucha.com](http://www.straconteescucha.com)



Email: [denuncias@straconteescucha.com](mailto:denuncias@straconteescucha.com)



Telephone: 0-800-1-8182 (only for calls from Peru) and +51 1 219-7182.



Voicemail: 0-800-1-8182 (option 2) ) and +51 1 219-7182 (option 2).



Send your written complaint to: Av. Víctor Andrés Belaunde 171, San Isidro, Lima 27, Lima – Perú.  
Attention: Rafael Huamán  
Reference: STRACON Te Escucha

Remember, at STRACON Group

- 1.** We promote a sincere culture where we can express any concern that we may have without fear.
- 2.** We do not tolerate retaliation against any person who reports possible misconduct in good faith or cooperates in an audit.
- 3.** All reports are anonymous and are treated as confidential.



## Our People

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### Integrity among Employees

To act with integrity, employees must:

- 1.** Respect each other without discrimination related to age, gender, race, religion, sexual orientation, nationality and / or ideology.
- 2.** Show fairness, honesty, efficiency, passion, safety aptitude, responsibility and a sense of belonging.
- 3.** Promote horizontal and transparent communication by respecting all points of view.
- 4.** Promote our values and instill them among new employees.
- 5.** Respect the customs and culture in all countries where STRACON operates and share our knowledge.
- 6.** Do not tolerate bullying and or sexual harassment
- 7.** Comply with the Policies and Procedures is a priority.
- 8.** Promptly report any breach of our Code of Ethics and Policies. In addition, cooperate fully and honestly during any audit.

## Integrity when dealing with Our Leaders

Leaders In order to act with integrity, all Leaders must:

1. Be an example to follow, maintaining consistency between your words and actions. We do what we say, and in an ethical manner!
2. Ensure that our employees know and understand the STRACON Policies, Standards and Procedures.
3. Promote the professional growth of our people based on equal opportunities and continuous learning.
4. Recognize and encourage our teams so that they act in compliance with the Code of
5. Encourage and ensure the participation of our employees and subcontractors in the training programs related to the Code of
6. Encourage a comfortable environment to talk about any ethical concerns of our employees.
7. Escalate any breach of the Code of Ethics and take the required actions.

## Integrity in Our Work Environment

All employees must:

1. Encourage a **good work environment** and provide maximum value to **life** and to the **integrity** of our workmates.
2. Maintain a safe and healthy Work Environment, by promoting a safety culture based on prevention.
3. Guarantee an adequate workplace, free of violent and/or disturbing acts.
4. The illegal possession and consumption of drugs, narcotic drugs and/or alcohol in the offices and projects is prohibited.
5. Always use the applicable personal protection equipment.



# Our Company

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## Integrity with Our Image

To preserve STRACON Group's image is to act with integrity. Therefore, we must:

- 1.** Be aware that our behavior, inside and outside of the company must not cause damage to STRACON Group's image or reputation.
- 2.** Clearly understand that **we do not** receive gifts or benefits that may be **intended** or **seem** to influence our **decisions**.
- 3.** **Openly** inform our **immediate chiefs** when we intend to offer gifts or benefits. We must take into consideration the **perception** that the recipients may have.
- 4.** Be able to demonstrate that our gifts and benefits are not intended to be considered as **fraud, corruption or bribery**. STRACON Group has **zero tolerance** towards such behavior.
- 5.** We must make business decisions thinking about what is best for STRACON Group and not to obtain benefits for ourselves.
- 6.** Avoid conflict between our personal interests and those of STRACON Group.
- 7.** Ensure that all of our commercial partners are aware of these guidelines.



## **Guidelines for Personal Relationships in the Workplace**

At STRACON, we carry out our duties with honesty, integrity, and adherence to ethical standards as outlined in our Code of Ethics. This ensures that all employees conduct their activities with integrity and responsibility.

In this regard, to prevent potential conflicts of interest arising from extralaboral interpersonal relationships among employees of the company, guidelines have been defined to guide behavior in the workplace.

Therefore, the Company requires all its employees to avoid romantic, friendly, or familial relationships that could give rise to a possible conflict of interest or breach of any internal standards.

As such, it is the responsibility of each employee to recognize through appropriate channels the existence of circumstances that may give rise to a conflict of interest or the appearance thereof, or a breach of any internal standards. If such circumstances are identified, they should be reported to their immediate supervisor.

Furthermore, the Company is committed to equal opportunities for all its employees. Therefore, all decisions related to employment opportunities, professional development, training, and general working conditions are based on objective criteria.

Failure to report a conflict of interest or a breach of any internal standards within the Company may be considered a punishable offense, depending on the circumstances considered in each case, as any act that involves favoritism towards an employee without demonstrable objective reasons is unacceptable within the Company.

Finally, we emphasize that any employee wishing to report a case of conflict of interest that may jeopardize objectivity and equality in the workplace has at their disposal:

**a. STRACON Listens** (Refer to page 4 for details).

**b. Human Resources and/or the leader in charge at the general office and projects.**

Once the complaint has been made, an investigation procedure will be followed to determine if there are any responsibilities for actions that contravene the ethical principles and standards of the Company, and if applicable, those responsible will be sanctioned in accordance with our legal and internal regulations.



## Behaviors that do not reflect that we Act with Integrity:

- Committing acts outside of the project that are against morality.
- Accepting or offering cash gifts is prohibited!
- Accepting gifts from providers that do not have a commercial relation with STRACON Group.
- Accepting gifts from providers during a selection process.
- Not reporting conflicts of interest with providers during a selection process or with relatives during an application process.





## Integrity in the use of Resources

To use STRACON's resources responsibly is to act with integrity. Therefore, we must:

- 1.** Respect and protect STRACON's assets, making sure that they are not lost, damaged, improperly used, wasted, loaned to others, sold or donated without authorization. Read and understand our "Responsible Use of Assets Standard".
- 2.** Account for our expenses honestly and appropriately, our expenses must be consistent with the development of our work, as well as reasonable, correctly documented and approved by the relevant authority according to the object and amount of the expense.
- 3.** Respect, protect and maintain the confidentiality of STRACON's information. All information to which you have access is the property of STRACON and it must not be used for purposes other than those of the business and not for personal benefits. Never share confidential information, protect it! Read and know our "Confidentiality Standard".
- 4.** Understand that STRACON's assets are not for personal use.
- 5.** Report any type of theft or fraud against STRACON, their commercial partners or another interested party; both affect our reputation. Theft and fraud are offences and we do not tolerate them at STRACON.

## Integrity related to the Policies and Laws that apply to us

To comply with the Policies and Laws is to act with integrity, therefore, we must:

1. Understand and comply with the laws and policies that regulate quality, health and safety, work, environment, corruption, taxes and money laundering. If you have any query, ask your Chief.
2. Ensure accurate and correct registration of transactions and operational activities. All of the transactions must have a legitimate commercial origin.
3. Ensure that we work with clients whose activities are legitimate and whose money does not come from illegal activities.
4. Be alert and report any real or potential money laundering situation or any illegal activities. Read and understand our "Policy for the Prevention of Corruption, Assets Laundering and Financing of Terrorism"
5. Be diligent and honest when selecting our partners, providers and people.
6. Avoid and reject any type of incorrect bribes or offers and inform Human Resources and/or the leaders in charge.
7. Ensure that our partners, agents, providers, etc. understand and comply with our Policies and Standards.
8. Respect the right to privacy of our workmates.
9. Know that we cannot destroy or alter any Company records that are necessary for a legal or government audit or review.



# Our Strategic Partners

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## Integrity when dealing with Our Partners

Act with Integrity when dealing with our Partners means that we must:

1. Encourage them to adopt our values, so they can share them and live in accordance with our culture and comply with our Policies and Standards.

## Integrity when dealing with Our Clients

Act with integrity when dealing with our Clients means that we must:

1. Gain their confidence and trust day-to-day. Their growth is our growth..
2. Understand, anticipate and meet their needs. We perform our work with excellence.
3. Address their requests diligently, always taking into account our Code of Ethics.
4. Manage their assets as if they were ours. In addition, treat their information as confidential.
5. confidentialHonor our promises. We comply with what we offer!

## Integrity when dealing with Our Providers

Act with integrity when dealing with our Providers means that we must:

1. Encourage them to adopt our values, so they can share them and comply with the Laws, our Policies and Standards.
2. Be diligent, persistent and honest when searching for the best offers.
3. Be clear during the tendering process. In addition, ensure that offers are similar, fair and selected without favoritism.
4. Pay providers on time and according to the agreed conditions.
5. Ensure that our providers financial situation is not solely dependent on STRACON Group.



## Our Society

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### Integrity when dealing with Our Communities

Acting with integrity with our Communities means that we must:

1. Understand and respect the local customs.
2. Ensure that our activities generate a real and long-term benefit to our Communities. Let's ensure that we aim to make a difference.
3. Contribute to their sustainable development.

### Integrity when dealing with the Environment

Environment Acting with integrity when dealing with the Environment means that we must:

1. **Protect it**, minimizing the environmental impact, within the legally permitted standards.
2. Consider that our care for the environment goes beyond the laws.
3. **Recycle** when possible and implementing strategies to reduce the consumption of water, energy and other resources.

### Integrity when dealing with the Media

Acting with integrity with the Media means that we must:

1. Obtaining your Manager's **approval** to publish information related to the Company, including Social Networks.
2. Be careful about giving your opinions. We must not give the impression that we are speaking **on behalf of STRACON.**





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