
	<b>INTEGRATED MANAGEMENT SYSTEM</b>	<b>T-GA-F-05</b>	
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	<b>CODE OF ETHICS</b>	Version	01
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## CODE OF ETHICS

### T-GA-F-05

Prepared by:	Reviewed by:	Approved by:
Anti-Bribery Compliance Officer	Representative of the Control and Audit Body	General Manager

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 <b>TAMA<sup>®</sup></b> <b>INGENIEROS S.A.C.</b>	<b>INTEGRATED MANAGEMENT SYSTEM</b>		<b>T-GA-F-05</b>	
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## 1. INTRODUCTION

This Code of Ethics of TAMA INGENIEROS S.A.C. (hereinafter TAMA) aims to promote and inspire the ideal of humane conduct of all parties involved, staff, customers, suppliers, and communities around five aspects: quality, environment, occupational health and safety, information security, and anti-bribery.

The scope of application reaches all shareholders, directors, managers, legal representatives, attorneys-in-fact, advisors or counselors, officers, and employees of TAMA, regardless of where they reside, as well as its branches or subsidiaries, its related or affiliated companies, and any third parties over which TAMA has control, including joint ventures, partnerships, as well as all agents, consultants, business partners and other third-party representatives when acting on behalf of TAMA. For this Code, the term "Third-Party representative" refers to any individual or company acting on behalf of TAMA, or otherwise performing a service for or on behalf of TAMA in any capacity. Similarly, "joint venture" refers to any business arrangement entered into between TAMA and one or more other entities (or "joint venture partners") agreeing to jointly undertake a specific business or to share the profits and risks of a business venture according to a contractual agreement.


Within TAMA's anti-bribery system, ethics is understood as the science that studies freedom and defines "what is good for me to do in terms of the consequences for others". Likewise, freedom is understood as a free act, which requires conscience (knowing) and will (willing) but at the same time demands to answer for the such act (merit or guilt). In this line, TAMA advocates the establishment of reliable contractual relationships with all market agents with which it is linked. For this purpose, it seeks to self-regulate and implement ethical, responsible, and transparent business conduct that contributes to the integrity of the market in which it operates, in order to promote investment and entrepreneurship and control the risk of conflicts of interest that may be harmful.

The Compliance Officer will ensure observance of this code and the anti-bribery policy, reporting directly to the General Manager, the Representative of the Control and Audit Body (ROCA), and the Senior Management Representative (RAD). However, the responsibility for compliance with the Code of Ethics corresponds to all and each one of the employees of TAMA INGENIEROS S.A.C., including all contracted personnel, under any modality.

In general terms, this Code of Ethics analyzes a set of situations that should be taken care of, but it does not detail all the problems that may occur in daily work. Thus, eventually, doubts may arise as to the most correct conduct to adopt. Therefore, each employee must immediately inform the Compliance Officer whenever a situation arises

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that could be considered a conflict of interest, when there is a suspicion, when there is a concern or when there is awareness of facts that could be harmful to the Company, oppose or seem to oppose what is established in the Code of Ethics of TAMA INGENIEROS S.A.C.

The following are the guidelines to be observed to comply with this code.

## 2. OUR VALUES

- a. Order of priorities; love of family, love of work.
- b. Development of activities based on honesty, discipline, respect, and safety.
- c. Trusting others and being trustworthy.
- d. Practicing the principle of giving back to society, by contributing our resources, shaping citizens who are more committed to the environment.
- e. Taking risks, managing continuous change, and launching initiatives.
- f. Knowledge is the basis for the best decisions; therefore, we encourage constant learning among our personnel.

## 3. ETHICAL PRINCIPLES

TAMA employees act in accordance with the following principles:

- a. Act with rectitude and honesty, seeking to satisfy the legitimate interests of the organization, its customers, and society as a whole.
- b. Reject corruption in all areas of the organization's development and fully complies with current regulations.
- c. Provide quality in each of the tasks he or she is in charge of, and seek the most appropriate and timely outcome.
- d. Act with caution and diligence in the handling of known or available information.
- e. It is committed to the care and protection of the environment, reducing the impact caused by the organization's activities.
- f. It is concerned about the safety of each employee, providing the necessary resources for their protection.


## 4. DUTIES AND PROHIBITIONS

### Concerning the Company

- 4.1.1. **Decorum in Company Image.** TAMA's employees are responsible for the preservation of the Company's prestige as a value that belongs to everyone, a value that is shared by the mere fact of belonging to it and participating in the common ideal. The faults that can be committed in this section are

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specified in the Internal Work Regulations.

**4.1.2. TAMA's assets.** TAMA's employees are responsible for the proper and rational use of the organization's property assigned to them for the performance of their duties.

In this sense, they must protect and conserve the company's assets, avoiding their abuse, waste, or squandering, without using or allowing others to use the company's assets for private purposes or purposes other than those for which they were specifically intended. In the same way, possible misconduct is specified in the Internal Work Regulations.

### Company Information

**4.2.1. Privileged information.** TAMA's employees shall refrain from using for their self-benefit, directly or indirectly, or for the benefit of third parties, information to which they have had access due to their condition or the exercise of their function. In this way, TAMA's employees are required to respect and guarantee the adequate preservation of oral, written, or electronic information of controlled documents, drawings, or alike.

**4.2.2. Advance of opinion.** TAMA's employees must refrain from expressing opinions without express authorization; through any means of communication, whether on company matters or disclosing confidential information; as well as intentionally providing false information. This point is established in Art. 115° of the Internal Work Regulations and is considered a serious offense in case it happens.


### The actions of the Company's employees

**4.3.1. Respectful Behavior.** All employees, following the values and ethical principles of TAMA INGENIEROS S.A.C., must follow respectful behavior in all their interactions with others. In this sense, they shall.

- a. Use appropriate verbal and body language.
- b. Ever express a professional and appropriate image.
- c. Consequently, clothing and grooming shall be consistent with the function performed by each employee, the environment in which he/she operates, and the culture and values of the company, and shall not cause discomfort to any person with whom he/she interacts.

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d. The company's employees are expected to show consistent behavior within the environment where they perform their functions and in their areas of influence.

**4.3.2. Theft or Fraud.** The company will not tolerate dishonest behavior; therefore, any employee who knows of any theft, fraud, or other dishonest action must immediately report it to his or her immediate supervisor or by email to [etica@tama.pe](mailto:etica@tama.pe).

**4.3.3. Discrimination.** Every TAMA employee is expected to treat their colleagues, suppliers, clients, personnel in recruitment or other interested parties with respect, without any type of discrimination in terms of social condition, belief, nationality, race, gender, sexual choice, religion, disability, illness, appearance or in general any characteristic that could generate any type of difference between people.

**4.3.4. Sexual Harassment.** The company will not tolerate conduct that comprises Sexual Harassment among its employees regardless of gender. Cases of Sexual Harassment will be dealt with under the Sexual Harassment Prevention and Sanction Procedure as stated in Chapter XVII of TAMA's Internal Work Regulations.

**4.3.5. Alcohol Consumption:** It is strictly forbidden for TAMA's personnel to enter or allow the entry of alcohol and/or drugs during their stay in the company's facilities. Any employee who appears to be intoxicated or under the influence of alcohol and/or drugs will not be allowed to enter the offices or their work areas, will not be allowed to remain in the workplace, and will be subject to the sanctions prescribed in the Internal Work Regulations.

## **Customer, Community, Occupational Health and Safety and Environmental Relationships**


**4.4.1. Commitment to the Client's needs.** It should be reflected in the respect for their rights and in the search for solutions that meet their interests, permanently in accordance with TAMA's objectives.

**4.4.2. Commitment to the Community, Occupational Health, and Safety and the Environment.**

a. **Commitment to the community.** TAMA is committed to creating and maintaining respectful relationships with the communities with which it relates, dealing in a timely manner with those aspects that may affect them, and periodically evaluating the impact of the organization's activities.

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- b. **Occupational safety and health.** Safety is an essential issue for TAMA. In this sense, the organization requires that the employees give priority to their safety and that of their team in any risk situation, understanding that such conduct is part of an efficient provision of services. To this end, TAMA's personnel must strictly comply with the safety measures required by the company at every opportunity, depending on the work they are in charge of.
- c. **Environment.** TAMA is committed to achieve the efficient use of natural resources, including the reduction and prevention of pollution and greater protection of resources in the development of the organization's activities. TAMA will also promote the development of green areas in order to improve environmental conditions for future generations; aiming to measure our Carbon Footprint as stated by the Peruvian Ministry of Environment (MINAM).

## Relationships in the work environment

- 4.5.1. **Appropriate Interaction.** Relationships in the work environment will be carried out based on the values established by TAMA, respectful treatment is unconditional for all interactions. All personnel involved must be committed to collaborating so that loyalty, trust, and tolerance prevail in every interaction.

It is forbidden to exert pressure and/or threats that may affect the dignity of the person or induce the performance of fraudulent actions.


- 4.5.2. **Recognition and opportunities.** It is essential to recognize the merit of each individual and promote equal access to existing professional development opportunities, according to the characteristics, qualities, and contributions of each employee. No decision that affects the professional career of subordinates based on personal relationships is allowed.

## 5. BRIBERY:

- 5.1. It is forbidden to pay, offer to pay, or authorize the payment, directly or indirectly, of anything of value to any government official, political party, candidate, any representative of a private corporation, or to anyone acting on behalf of a public international organization to obtain, retain or ensuring

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business or its result, transferring business to any person or for obtaining an improper business advantage. An offer, plan, or promise to pay or give anything of value may constitute a violation of this Code.

The term "anything of value" should be interpreted in an illustrative but not limiting manner as:

- a. Money, gifts, or personal favors.
- b. Meals and entertainment.
- c. Shares.
- d. Discounts on products and services that are not readily available to the public.
- e. Job offers for government or private company officials or their relatives.
- f. Political contributions.
- g. Payments to third parties; payment of travel expenses; and assumption or forgiveness of debts.

The term "government official", "public official" or "private sector official" (indifferently) should be understood as:

- a. Employees or officials of the Peruvian government and/or government-owned or mixed-capital companies or private companies.
- b. Officials of public or private international organizations.
- c. Persons acting in an official capacity for government officials or officers/employees of government-owned or privately held companies.
- d. Any officer, employee, or representative of governmental authority, or any person acting in any official power for or on behalf of governmental authority. For these purposes, "governmental authorities" include national or local government institutions, associations, companies or enterprises owned or controlled by the government, and supranational organizations.
- e. Legislative, administrative, regional, municipal, or judicial officials.
- f. Officials or persons holding office in a political party or political candidates.
- g. Persons otherwise exercising a public function for or on behalf of any country.


**5.2.** This prohibition applies to all employees as well as third parties acting on our behalf.

**5.3.** Employees are responsible for ensuring that the third-party representatives with whom they have a relationship comply with this code, and to this end, they must have a written contract.

**5.4.** Any shareholder, director, manager, legal representative, attorney-in-fact, advisor or counselor, officer, and/or collaborator of TAMA, as well as of its branches or subsidiaries, its related or affiliated companies, and

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any Third-Party over which TAMA has control, including consortiums, joint ventures, joint venture partners, as well as all agents, consultants, business partners and other Third-Party representatives when acting on behalf of TAMA or behalf of an entity or business unit of TAMA in Peru or abroad, regardless of where the act is performed, is prohibited from:

- a. Offering, receiving, promising, or authorizing a financial or another advantage, with the intent to cause improper behavior; or rewarding improper performance of a relevant function or activity by another person.
- b. Offering, receiving, promising, or authorizing a financial or another advantage, with the knowledge or belief that its acceptance constitutes in itself an improper performance of a relevant function or activity by another person.

Under this code, the term "inappropriate performance" refers to a performance caused by an expectation that such person will not act (a) in good faith; (b) impartially; or (c) in accordance with a position of trust.

TAMA recognizes that, in sporadic cases, not agreeing to the payment of a bribe may endanger the welfare of its employees or third-party representatives and their safety. If this is the case, reasonable steps must be taken to remove themselves from danger and immediately communicate any such situation to the Compliance Officer in order to take action as a company before the Peruvian state authorities.

## 6. ANTI-BRIBERY CONSIDERATIONS:


In TAMA, under the application of the Anti-bribery Management System and legal compliance in force, we promote that our activities with our employees, customers, suppliers, public institutions, community, etc. (business partners) are carried out transparently, strictly committed to compliance with current legislation related to anti-corruption practices, preventing all types of illegal practices related to bribery, extortion, fraud, collusion, and other crimes.

If attitudes or acts against our code of ethics are detected, TAMA will report them through corporate emails designated with our business partners, with a carbon copy to the immediate supervisor or the ethics channel if it exists. If TAMA does not receive a formal response, will persist with other superiors until the corresponding corrective measures are defined.

The **business partner** undertakes to assume liability for any damage to TAMA

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due to non-compliance with the aforementioned legal regulations.

For any complaint or concern regarding any illegal practices of our employees, please contact us at [etica@tama.pe](mailto:etica@tama.pe).

## 7. POLITICAL CONTRIBUTIONS:

- 7.1. TAMA may not receive or grant gifts, courtesies, or benefits to any candidate or political party. It is not allowed that any of its funds or resources to be used as a contribution to political movements, political parties, political candidates, or any of its affiliated organizations to obtain business or any other advantage in the conduct of its business.

## 8. DUE DILIGENCE:


- 8.1. Due Diligence is the process by which a person or company is investigated before signing a contract or economic agreement.
- 8.2. TAMA performs due diligence on customers, suppliers, employees and business partners in each of its processes.
- 8.3. TAMA shall maintain a record of all due diligence performed on any relationship or project subject to its policies and procedures, as well as a record of any denial of approval of relationships or projects, together with a summary of the reasons for such denial.

## 9. FINANCIAL AND NON-FINANCIAL CONTROLS:

- 9.1. It is TAMA's policy to keep and maintain records and accounts that reflect the transparency of transactions.
- 9.2. All transactions are required to be recorded in the financial statements.
- 9.3. TAMA is committed to ensuring that the information is truthful, timely, complete, accurate, complete, and backed up with documents that support their transactions.
- 9.4. It is forbidden to alter the truth of the accounting entries and records, modify documents or reports, as well as hide information that may alter the final results of the operations. In this sense, TAMA undertakes to:
- Maintain books, accounts and records that accurately reflect the veracity of all transactions and disposition of cash in the company.
  - Maintain an internal control accounting system that can detect and prevent illicit payments to government and/or private officials.
  - That the accounting transactions recorded are in accordance with generally accepted accounting principles or international financial reporting standards;

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and


- d. Perform periodic comparisons of recorded assets against existing assets to identify and address differences or discrepancies.

## 10. IMPLEMENTATION OF ANTI-BRIBERY CONTROLS BY ORGANIZATIONS AND BUSINESS PARTNERS:

### 10.1. CONTRACTS WITH THIRD PARTIES:

- 10.1.1. Third-party representatives must comply with the Anti-Bribery Policy, for this purpose, they must have a written contract that formally reflects the scope of services to be performed, the terms of compensation, and that includes an explicit clause on the knowledge and compliance with the Code of Ethics and the Commitment to the Anti-Bribery Policy and the Code of Ethics.
- 10.1.2. TAMA shall be responsible for the activities of its subsidiaries, affiliates, related companies, and third parties over which it exercises control, including joint ventures and joint ventures, as well as for the activities of its agents, consultants, business partners, and other third-party representatives when acting on behalf of TAMA.
- 10.1.3. When shareholders, directors, managers, legal representatives, attorneys-in-fact, advisors or counselors, officers, and employees of TAMA establish a relationship with Third-Party Representatives, they must necessarily:
  - a. Implement a Third-Party Representative selection process.
  - b. Identify that the Third-Party Representative has no legal impediment for the exercise of the functions.
  - c. Establish a contractual legal relationship with the Third-Party Representative on terms that include a commitment to be bound by this Code and an anti-bribery clause.
  - d. Verify the information provided by the Third-Party Representative as part of its background and other forms submitted to the company.
  - e. Maintain an updated Third-Party Representative file with updated information obtained during the periodic review procedures of the relationship.
  - f. Contain an anti-bribery clause, acknowledging that the Third-Party Representative will conduct itself in accordance with the provisions of the UK Bribery Act, the U.S. Foreign Corrupt Practices Act (FCPA), other international anti-corruption laws, and under the provisions of this policy. If in doubt about the detailed aspects of any applicable anti-corruption laws, please contact TAMA's Compliance Officer.
- 10.1.4. Contracts shall include TAMA's right to conclude the contract when a violation of this Code of Ethics occurs.

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**11. PARTNERSHIPS:**

- 11.1. TAMA shall know the background, business practices, and anti-corruption control measures, for which the commercial area shall conduct a preliminary investigation of the business partner.
- 11.2. The Company shall not enter into any partnership or consortium without first conducting the appropriate investigation and verification and having the final approval of the General Manager.

**12. ANTI-BRIBERY COMMITMENTS:**

The prohibition of bribery at all levels shall be communicated to all business partners via e-mail or other written means of dissemination.


**13. GIFTS, HOSPITALITY, DONATIONS, AND SIMILAR BENEFITS:**

**13.1. Gifts, courtesies, and/or handouts:**

- 13.1.1. It is forbidden to make payments in money, courtesies, gifts, presents, and entertainment that could influence a relationship or business decision.
- 13.1.2. Personnel is not permitted to accept cash payments or gifts to award contracts or orders to suppliers, subcontractors, or service companies.
- 13.1.3. TAMA does not give gifts of any kind to its customers or suppliers. Except in exceptional cases authorized jointly by the General Manager and the Senior Management Representative (SMR), company-branded products of modest value (not exceeding US\$ 10.00 or the equivalent in any other currency such as pens, key rings, or diaries) may be given occasionally, provided that such items are legitimately part of events, inaugurations, or conferences organized by TAMA.
- 13.1.4. All gifts or services (such as travel or training) given by suppliers or customers to TAMA employees, whether they arrive at the company's headquarters or from projects under development, must be sent to the Head of People Management to be raffled among the members of the company at the end of each year. The maximum value of these should not exceed US\$ 30.00 or its equivalent in any other currency.
- 13.1.5. Gifts, courtesies, or services (such as travel or training) should be received at an appropriate time or season and/or in appropriate circumstances when they do not influence a negotiation or business decision.

Therefore, the acceptance of gifts and hospitality during the negotiation process is not permitted.

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**13.1.6.** It is not permitted to receive gifts or services (such as travel or training) at addresses other than TAMA.

**13.1.7.** Under the authorization of the General Management and the RAD, the payment of travel, lodging, and/or per diems will be allowed as appropriate and when their presence is necessary for the development of the business. In no case shall payments to family members or cash be included, the related expense must be reported to treasury and reflect its true purpose.

**13.2. Business courtesies.**

**13.2.1.** TAMA does not provide "courtesies" in its business, meaning gifts, promotional items, meals, services, entertainment, loans, favors or anything else of value, related to the promotion of the products manufactured by the company.

- a. Only in exceptional cases, courtesies must be expressly approved by the General Management and the RAD.
- b. For TAMA activities outside Latin America, and if approved, courtesy should be consistent with local practices.
- c. The expense for the duly authorized courtesy must be recorded in the company's accounting records.

**13.2.2.** These exceptions apply even to business courtesies to representatives of current or potential customers, suppliers, or other business partners or competitors, as well as their relatives or others with whom they have a close personal relationship. The delivery of the courtesy should in no case embarrass or damage TAMA's reputation.

**13.3. Meals**


Unless there are more restrictive tax rules for income tax expense recognition purposes, TAMA may extend meals to a government official or private individual only if this courtesy is valued at US\$30.00 (or its equivalent in local currency) or less, per person. However, if the frequency or timing of such gifts could create the appearance of undue influence, they are prohibited. In any event, under no circumstances may this courtesy be made for improper purposes. Expenditures over the said amount will require the joint authorization of the General Manager and the RAD.

**14. CONFLICT OF INTEREST:**

**14.1.** A conflict of interest exists when an employee uses his or her position at TAMA to benefit personally, financially, or otherwise (or for the benefit,

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financial or otherwise, of family members or other related persons), beyond the normal employment compensation and rewards offered by TAMA. A conflict of interest also arises when an employee's interests are inconsistent with those of TAMA, thus creating a conflict of loyalties. Such a conflict of loyalties could cause an employee to privilege his or her interests in situations where he or she should give preference to responsibilities to TAMA.

- 14.2. Employees must avoid situations in which their interests may conflict, or even appear to conflict, with the interests of TAMA.
- 14.3. Conflicts of interest are not permitted at TAMA. If a conflict arises between private interests and those of TAMA, the employee in question must immediately inform the General Manager as well as the Compliance Officer appointed by TAMA so that an appropriate solution can be found to resolve the conflict. However, it shall be prohibited:
  - a. Using company property for personal use.
  - b. Intervening in operations or transactions that benefit the Third-Party, to the detriment of the company.
  - c. Accepting bribes from customers, suppliers, or third parties to perform or omit to perform an act or process that benefits them.
  - d. Participate in the management or promotion of another company with similar activity to TAMA.
  - e. Work in their free time for a company with similar or complementary activity to that of TAMA.

## 15. RAISING CONCERNS.

- 15.1. TAMA employees who in the performance of their duties identify acts in the administration and management of the organization contrary to the provisions of this Code of Ethics must report them to the Compliance Officer, directly or through their boss or corresponding Management. This information is established in the **Procedure for concerns, investigation and treatment of bribery T-GA-PT-03**, which specifies the step-by-step process for submitting a concern about an identified act of bribery.
- 15.2. The Compliance Officer is in charge of receiving inquiries, complaints, and reports on possible acts of violation of the code of ethics. Likewise, the Compliance Officer will be directly responsible for reporting to the General Manager the concerns presented by TAMA's personnel with all the related supporting information, otherwise, he/she will be responsible for his/her omission.
- 15.3. TAMA encourages the raising of concerns in good faith (inquiries or complaints) in the event of a suspected bribery event or conduct and

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guarantees confidentiality.


- 15.4.** If there is any concern that the making or receipt of a payment or the taking of a particular course of action may be in breach of anti-corruption laws or the principles contained in this Code, or if there is any suspicion that a breach of anti-corruption laws is being or may be about to be committed, it should be reported to the following mean:
- Email: [etica@tama.pe](mailto:etica@tama.pe).

## 16. CONFIDENTIALITY:

- 16.1.** TAMA personnel shall not disclose any data or information used in the development of their activities as collaborators, as described in the confidentiality agreements signed upon hiring.
- 16.2.** The handling of confidential or privileged information and in particular the intellectual property of methods, procedures or processes, diagrams, and software created by and for TAMA or its customers, must be managed under high-security standards and must not benefit any person in particular and less a third-party competitor. The confidentiality of the information accessed must not be disclosed in a manner that affects the interests of TAMA or those of its customers and, in particular, to comply with the Personal Data Protection Act. Therefore, it is forbidden to use it for other purposes:
- The personal data of the company's employees and executives.
  - The results of negotiations or dealings with customers and suppliers.
  - Information on staff income and compensation to independent contractors and consultants. However, TAMA reserves the right to disclose among its employee information on their salaries so that they can verify that the company complies with the 10:1 rule established in its Life Plan of TAMA INGENIEROS S.A.C. T- GG-PL-03, which states that the highest salary of a manager in TAMA is, at most, ten times the lowest salary of an operator or assistant.
  - Passwords and access codes to the internal network.
  - Any contractual document or commitment subscribed by TAMA.
  - The technical and economic proposals in public or private processes or tenders in which TAMA participates.
  - The company's strategic plans and operational documents.
  - Drawings and calculation reports.
  - The company's financial or technical information, cost data, prices, ratios, and unit rates.
  - Data from research records, patented processes or formulas, exclusive designs of equipment, machinery, and processes, for production purposes.

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Anti-Bribery Compliance Officer	Representative of the Control and Audit Body	General Manager

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 <b>TAMA<sup>®</sup></b> <b>INGENIEROS S.A.C.</b>	<b>INTEGRATED MANAGEMENT SYSTEM</b>	<b>T-GA-F-05</b>	
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- k. Judicial, arbitration, and administrative disputes in which the company is involved, including its strategies.

**17. SANCTIONS:**


Article 100 of the Internal Work Regulations states that the main purpose of disciplinary sanctions is for employees to rectify their behavior; however, in the case of serious misconduct, they are grounds for dismissal. Likewise, Article 101 of the Internal Work Regulations specifies that all personnel must be aware of the rules contained therein since ignorance of these rules will not be used as a defense. For this reason, this Code of Ethics sets out a series of additional obligations that must be assumed by the collaborators and others involved.

- 17.1.** The observance and compliance with the Code of Ethics established by TAMA is the responsibility of each of its employees and extends to personnel who provide services under contracts other than employment contracts, as well as to trainees as applicable.
- 17.2.** Each Manager and process manager assumes the responsibility of guiding their personnel towards compliance with the Code of Ethics. Failure to comply with the Code of Ethics will be considered, as appropriate, as labor misconduct to the Internal Work Regulations; as administrative misconduct, as it is determined that the behaviors constitute actions punishable under the provisions of the Internal Work Regulations.
- 17.3.** When any sanction related to non-compliance with the Code of Ethics must be applied, it must be reported to the General Management, the ROCA, and the RAD, to gradually unify the most appropriate criteria for action in cases where an infraction occurs.
- 17.4.** As stipulated in Article 106° of the Internal Work Regulations, disciplinary sanctions in TAMA are applied according to the seriousness of the offense committed, the category, seniority, and disciplinary record of the employee; being these:
  - a. Verbal reprimand (in the case of an employee, this reprimand must be communicated by e-mail).
  - b. Written warning (memorandum).
  - c. Suspension (through a memorandum and a meeting with the respective Management indicating the seriousness of the situation).
  - d. Dismissal.
- 17.5.** Failure to comply with the Code of Ethics will be subject to an internal investigation and the application of the disciplinary measures contemplated

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in the Internal Work Regulations, sanctions ranging from termination of employment, termination of the business relationship, and the initiation of legal action if appropriate.

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**CODE OF ETHICS**

TAMA INGENIEROS S.A.C., I declare that I have received a copy of the Code of Ethics of year 20\_\_.

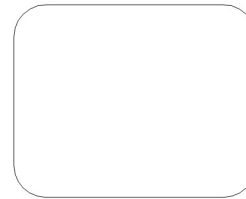
I also declare that I will read it carefully and that I will comply with all its terms and scope.

EMPLOYEE: .....

Position.....

Area.....

Signature..... Fingerprint



Date.....

TAMA INGENIEROS S.A.C., I declare that I have received a copy of the Code of Ethics of year 20\_\_.

I also declare that I will read it carefully and that I will comply with all its terms and scope.

EMPLOYEE: .....

Position.....

Area.....

Signature..... Fingerprint



Date.....

Prepared by: Anti-Bribery Compliance Officer	Reviewed by: Representative of the Control and Audit Body	Approved by: General Manager
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