



CODE OF ETHICS AND CONDUCT

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Next Revision Date	Not applicable
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Revision History		
Rev No.	Changes	Date
01	Law 31740 Law that amends Law 30424, the law that regulates the administrative responsibility of legal entities, was added to strengthen the anti-corruption regulations referring to legal entities and to promote good corporate governance.	14/08/2023
02	In Article 33, the position of head of Human Resources was changed to Deputy Manager of Human Resources.	20/11/2023

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PRESENTATION

Master Drilling Peru S.A.C. believes that ethics and conduct are essential within the organisation, and complement collaboration, understanding, harmony and participation among employees and stakeholders.

This Code aims to provide the organisation's management, its employees, suppliers, clients and stakeholders, where Master Drilling Peru retains administrative control or has relations, and other related parties, with a swift instrument for the fulfilment of the vision, mission and corporate purpose, in strict compliance with the institutional philosophy and strategic objectives of the organisation.

We have established mandatory criteria for the interpretation and application of this Code of Ethics and Conduct, as well as the vision, mission and values of our organisation:

- **Mission**
 - Master Drilling Peru Group challenges the status quo to provide our clients with specialised, customisable, and comprehensive drilling service solutions.
- **Vision**
 - Sustainable Growth: To grow the business in a sustainable manner, using our know-how and diversifying into new geographic areas, industries and clients.
 - Technology Optimisation and Development: To be flexible and provide specialised services to suit our client's requirements, applying technology development as a competitive advance to improve business performance.
 - People Capacity and Development: The foundation of our strategy is the people who make it happen; our success depends on how our skills and expertise support our goals.
 - Optimisation and Increased Profitability: To optimise our business by finding ways to be more effective and efficient in what we do, on a daily basis, in all our areas of operation.
- **Values**
 - Respect: We create an inclusive and diverse workplace where we respect the views and feelings of those around us and consider the impact of our words and actions.
 - Accountability: We take responsibility for our actions and support business decisions based on experience and good judgment.
 - Innovation: We challenge the status quo and proactively seek new, different or more effective ways to improve performance and service delivery.
 - Safety: We are mindful of the safety and well-being of those around us and share a personal and professional commitment to protect the safety and health of our employees, contractors, clients and communities where we operate.
 - Efficiency: We use tools, technologies and resources to maximise efficiency and effectiveness in order to deliver services on time and within budget.

CODE OF ETHICS AND CONDUCT

INTRODUCTION

This Code of Ethics and Conduct defines our commitment to respect ethical principles towards the Government, employees, the community, suppliers, business partners and other related parties.

Our commitment to the Government is and will be to respect and support the different powers of the Peruvian State and its legitimately constituted authorities, and to correctly apply the legal rules.

Master Drilling Peru recognises the importance of employees and ensures a good working environment, with the aim to improve organisational practices that may benefit the quality of life, development and productivity of our employees.

Master Drilling Peru acts in industry or national matters (applicable legislation), ensures the improvement of people's quality of life, uses technology that represents the least risk for the environment and takes part in works or events of common benefit.

Our commitment to suppliers is to seek excellence, maintaining an ethical and responsible conduct, respecting the rights of people and environment; for this reason, suppliers of goods and services will be selected and procured following the criteria described herein, according to the scope and statements of Appendix 2 to this document: "Supplier Code of Conduct."

As for stakeholders, we aim to achieve the organisation objectives within an environment of respect and trust; we will treat them fairly; we will respect their rights; we will inform them in a timely, truthful, transparent and complete manner about the status of Master Drilling Peru.

Master Drilling Peru believes that business operations and services should be conducted in an ethical, honest, professional and legal manner.

The organisation expects all its employees to share its commitment to high moral, ethical and legal standards.

Likewise, this Code is intended to regulate and clarify conflicts of interest within the workplace for all employees, and to establish guidelines related to them.

This Code will remain in effect from the date of approval until its amendment and distribution as an updated code.

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GENERAL PROVISIONS

CHAPTER 1 – GOVERNANCE OF MASTER DRILLING PERU

Article 1 – Mechanisms for Evaluating and Controlling Management Activities

Senior Management and Governing Body of Master Drilling Peru conducts a review of activities by the organisation in order to evaluate management activities and perform relevant controls.

Article 2 – Integrity Committee

The organisation and responsibilities of our Integrity Committee are defined in the "Integrity Guidelines Manual" (MD-MCPL-001).

If requested by the Compliance Officer, the Integrity Committee will evaluate possible conflicts of interest among employees, business partners and the organisation, or between them and other legal entities, as well as any particular situation that could give rise to a conflict or interfere with the organisation interests.

Upon evaluation of each case, the Integrity Committee will draw up minutes of the decision made, and send them to the persons involved, who may in turn share them with the parties they deem relevant.

Article 3 – Mechanisms for Preventing, Handling and Disclosing Conflicts of Interest

A conflict of interest exists when an employee or business partner interest arises as part of the performance of their job duties, which may be inconsistent with the organisation's interests, and the satisfaction of both interests is not possible.

Employees, suppliers and business partners must act with diligence and loyalty to the organisation and must refrain from intervening directly or indirectly in situations, decisions, management or activities in which there is a conflict of interest, in accordance with the above definition.

Employees and business partners must refrain from:

- Employing the Organisation information for personal use.
- Engaging in activities that may conflict with their duties and loyalty to the company.
- Having an economic participation in a company that is a supplier or client of the Organisation without informing the same.
- Dedicating work time and assets of the organisation to personal interests or interests unrelated to the purposes of the Organisation.
- Informing the organisation of any conflict of interest arising from providing professional services to persons outside the organisation as an employee or consultant in areas similar to those in which he/she works in the Organisation.

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Conflicts of interest that may arise between employees or business partners and the organisation shall be submitted to the Compliance Officer and/or the Integrity Committee for consideration.

As explained above, all employees or business partners must disclose conflicts of interest, whether actual or potential, their own or those of other employees or business partners, as well as any particular situation that may be contrary to the coexistence of the organisation. The above disclosure must be made immediately upon becoming aware of the situation, by means of a written communication to the employee's immediate superior, to the Head of Logistics process in the case of a supplier or to the Head of the Commercial Management process in the case of a Client. The fact must also be notified immediately and in writing to the organisation's Compliance Officer.

In any situation in which there is doubt regarding the possible existence of a conflict of interest, the employee, supplier or business partner must proceed as if it existed.

Article 4 – Mechanisms for Implementing adequate Internal Control Systems and their Disclosure

The organisation, within its internal control system, shall have the necessary means to protect economic resources against losses due to inefficiency or fraud and shall promote order, effectiveness in the performance of its activities, accuracy and reliability of the information required for its management and control, and compliance with legal regulations.

To this end, it will have budgetary and costing tools, chart of accounts, standard procedures and forms designed to document main operations, supported in great part by an integrated information system.

In addition, the organisation will have specialised audit and control services, which, based on its business strategy, will independently evaluate compliance with goals and objectives, internal controls, accountability systems and risk management, and identify opportunities to optimise control plans.

In order to define corporate guidelines for the organisation, related to the prevention, detection, investigation and response to fraud and corruption risks, the Organisation has accepted and adopted the "Crime Prevention Management System Policy" (MD-003) that aims to reduce the potential occurrence of such risks.

The document Anti-Fraud and Anti-Corruption Guidelines is part of this Code as "Appendix No. 01," and applies to employees and business partners who have any relationship with the organisation.

Additionally, the organisation has defined corporate guidelines for the prevention and control of money laundering and terrorist financing risk management in the document entitled Guidelines for the Prevention of Money Laundering and Terrorist Financing, which makes part of this code as "Appendix No. 03."

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These guidelines are intended to reduce the possibility that the organisation, in the development of its operations, be used directly or indirectly for the concealment, handling, investment or use of any form of money (money, bills, coins, deposits on account, etc.) and other assets derived from illicit activities.

Article 5 – Relationship and Kinship between Employees

Persons linked by marriage, common-law marriage or kinship, except when they work in the same area or there is a direct or functional reporting relationship, and they are close relatives (up to the third degree of consanguinity or affinity, or first degree of kinship by law), may be employed by the organisation and remain in it.

Article 6 - Business Relationships between the Organisation and the Spouse, Partner, Relatives, Associates of an Employee or Business Partner

The organisation believes that relationships with clients and suppliers give rise to situations where actual, potential or apparent conflicts of interest could occur.

Business relationships between the organisation and the spouse, partner, relatives up to the fourth degree of consanguinity, second degree of affinity and first degree of kinship by law, or associate of an employee, supplier or business partner of the organisation, are governed by the transparency criterion. Pursuant to it, the organisation must ensure that they are fully aware of the relationship of kinship or association with a possible supplier of goods or services, and that the area responsible for the selection process will choose a candidate that best suits the organisation interests, based on experience, quality and price, without implying that the lowest price represents the prevailing selection criterion.

No employee should be interested in the organisation entering into or carrying out business with the persons indicated in the first paragraph, without unrestricted respect for the due selection process.

Nor may they enter, on behalf of the organisation, into business in which the employee, his or her spouse, partner or relatives up to the fourth degree of consanguinity, second degree of affinity, and in particular, with suppliers, business partners, with whom the employee has or has had any type of relationship that prevents ensuring objectivity and independence in business relationships of them with the organisation.

Employees dealing with suppliers and clients must ensure that they represent the best interests of the organisation and that their judgment is not affected by their relationship with the supplier or client. This means that relationships with clients or suppliers must not influence or give the impression that their decisions are influenced by this relationship, when performing their duties for or on behalf of the organisation.

Employees must not invest in or acquire a financial interest (directly or indirectly) in the business of a supplier or client. Likewise, employees may not give preferential treatment to suppliers or clients because of their relationship.

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Article 7 – Selection of Suppliers

Suppliers of goods or services shall be selected in accordance with the criteria of free competition in the market, improvement of efficiency and institutional profitability within the principles of respect, loyalty and good faith, as well as sound business practices.

The organisation shall disclose, subject to the requirements established by law and in compliance with article 3 of this Code, its legal and economic ties with its main suppliers of goods or services or with its employees or management personnel, without prejudice to the confidentiality established by virtue of contracts or legal provisions.

All relationships established between the organisation's employees and different suppliers of goods or services, from the selection process to the awarding of contracts, shall be governed by the guidelines contained in the Supplier Code of Conduct, provided by the organisation as an appendix to this document.

All suppliers of goods and services for the organisation shall comply with the Supplier Code of Conduct, which is part of this code as "Appendix No. 02."

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CHAPTER II - EMPLOYEES AND BUSINESS PARTNERS CONDUCT RULES

Article 8 - General Approach

The organisation shall not tolerate unethical and dishonest behaviour. Therefore, employees must ensure that their conduct is in no way construed as a contravention of the laws and regulations governing the company or their profession.

Master Drilling Peru employees are expected to act conscientiously, maintain moral and ethical standards, and perform their duties responsibly, honestly and in accordance with the best interests of the organisation.

In addition to this commitment to their performance, employees must always demonstrate uncompromising integrity.

This Code is intended to communicate Master Drilling's desire to eliminate unethical practices by creating a productive, safe and orderly environment where employees are encouraged to act with honesty and integrity.

All employees and business partners are required to comply with the laws, provisions and regulations issued by the authorities, as well as the policies set by the organisation.

Employees in particular, whether they work in person, remotely, or from home office are required to comply with the provisions of this Code, and all policies, procedures and internal existing or future practices of the organisation.

Each employee of Master Drilling Peru is personally committed to follow, protect and support our Code of Conduct. Master Drilling Peru strives to foster a culture where compliance with key integrity policies and applicable laws is at the core of business activities.

Employees will comply with the "Sexual Harassment Prevention and Intervention Regulation" to prevent sexual harassment. In the event of any breach by employees, they shall be subject to the disciplinary regime provided for in the "Internal Work Regulations of the Organisation."

The interests of the organisation shall always prevail over the particular interest of the employees and business partners, when the conduct and ethics of the employee or business partner may be compromised in business related to the service.

No business may be entered into or carried out, directly or indirectly, that is, by oneself or through other persons, that may be contrary to the interests of the organisation in accordance with good business practice.

Employees and business partners must always act in accordance with the correct running of the organisation's activities and business, avoiding any conflict of interest and systematically rejecting any connection with persons, companies or associations of companies in direct or indirect competition with Master Drilling Peru or that provide the same or similar services to the organisation.

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Article 9 – Loyalty

Employees shall act with loyalty, good faith and as diligently as a good professional, putting the interests of the Organisation before personal interests.

Article 10 - Use of Position

No employee may use the knowledge he/she has gained while working with the organisation or his/her position in the organisation or the name of the organisation for his/her personal or private benefit in such a way that an actual or potential conflict arises in which an employee, a member of the employee's family (spouse, partner or relative up to the fourth degree of consanguinity and second degree of affinity) or a business with which the employee or his/her family is associated obtains profit, privilege, special treatment, advantage or benefit in terms of loans or supply of goods and services from persons who commonly do business with the organisation or who intend to do business with it.

In the performance of their duties, employees must treat people outside the organisation fairly, loyally and on equal terms, so that relations between them and the organisation do not result in advantageous treatment for some, nor induce natural or legal persons outside the organisation to feel obliged to have special considerations with an employee.

Employees of the organisation may not seek to obtain benefits for themselves, their relatives or persons outside the organisation, with respect to privileged or confidential information or opportunities presented to them by their position in the organisation. They may not participate in activities or businesses contrary to the law or good customs that affect the good name of the organisation.

They are required to properly use and preserve the information that, in the performance of their duties, they become aware of, and are responsible for ensuring that it is used exclusively for institutional purposes and must prevent this information from being leaked for unauthorized use.

Sensitive and confidential information is any information of the organisation that is not public knowledge and that included in the legislation on the protection of personal data and information security. A breach of this obligation by the employee will be sanctioned in accordance with the organisation's Internal Work Regulations.

A payment that, legally, statutorily or ethically, cannot be made by the organisation, shall not be made indirectly by an employee, a family member, or any other person receiving the money or a reimbursement of funds.

Article 11 - Organisation's Funds and Assets

Employees must, at all times, ensure that the organisation's funds and assets are used only for legitimate business purposes of the organisation. When an employee's position requires

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decision-making on how to spend the organisation's funds, it is the employee's responsibility to use his/her best judgment on behalf of the organisation and to ensure that proper value is received for expenditures.

The organisation has developed a series of internal controls to protect its assets and imposes strict rules to prevent fraud and dishonesty.

All employees who in any way have access to the organisation's funds must at all times follow established procedures for recording, handling and safeguarding funds.

If employees become aware of any situation in which the organisation's funds or assets are used in an inappropriate or fraudulent manner, they must inform the organisation immediately and confidentially. The organisation will reward employees who provide evidence that directly helps to eradicate of such practices.

The assets, products and in general the human and material resources of the organisation, must be used exclusively for the proper functioning of the organisation, which obliges to avoid any inappropriate use of them or be lent to natural or legal persons outside the organisation, in accordance with applicable law.

Article 12 - Business with Employees and Suppliers separated from the Organisation

No contract, business or operation may be entered into or executed with employees or suppliers who have been separated from the organisation and whose separation was the result of conduct contrary to the policies and interests of the organisation.

Article 13 - Business with Persons outside the Organisation

The organisation respects the right of all employees to make personal investment decisions as they see fit, as long as these decisions do not cause conflicts of interest, and as long as these decisions are not made on the basis of material non-public information acquired because of the employee's connection to the organisation.

Employees must not allow their personal investment transactions to take precedence over transactions made for the company.

Any employee who has or intends to acquire economic, managerial, administrative or labour participation in companies in direct or indirect competition with the organisation or that provide the same or similar services to those required, must report this situation to his or her immediate superior. The latter will evaluate whether it is worthy of raising and obtaining a written statement by the Integrity Committee. The same procedure shall be followed by the employee when it is a question of entering into business with companies in which his/her spouse, partner or relatives,

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up to the fourth degree of consanguinity, second degree of affinity and first degree of kinship by law, have economic, managerial, administrative or labour participation.

Article 14 – Acceptance and Offering of Gifts, Hospitality and Favours

Conflicts of interest may arise if gifts, hospitality or other favours are offered to employees that may influence, or may be considered to influence, their judgment regarding business transactions, such as the placement of orders and contracts.

Employees, as well as Senior Management and the Governing Body must avoid offering and giving gifts, incentives or courtesies of any kind to clients, suppliers, consultants, public servants or any other interested party, which could be construed as an inappropriate influence or a biased decision on a business negotiation. Any act of actual or potential, passive or active bribery by the employee or others must be reported via the organisation's whistle blower channel, at its option.

It is in the interest of the organisation that employees, as well as Senior Management and the Governing Body, refuse any kind of courtesy, whether in cash or in kind, such as gifts, invitations, fees, trips, participation, any other offer, other personal favours or preferential treatment offered by suppliers or clients, regardless of the position they hold, to prevent the employee from developing an affinity or having the obligation to respond favourably to the services, bids or business proposals of clients or suppliers.

Within this aspect, employees, as well as Senior Management and the Governing Body must comply with the procedure "Control of gifts, hospitality, donations and similar benefits" (MD-PCPL-005).

Article 15 – Anti-Fraud and Anti-Corruption Guidelines

The behaviour of employees must take place within a framework of transparency and ethics, which means that any kind of corrupt practices in transactions with clients, suppliers and governmental authorities is prohibited.

When an unethical behaviour of an employee transcends to the criminal level, the organisation will comply with all relevant legal provisions.

Article 16 – Information provided by the Organisation and its Employees

The information provided by the organisation and its employees must be true, complete, verifiable and in full compliance with the restrictions imposed by law or contract regarding its disclosure.

Management, trusted personnel and other employees shall keep information confidential and may not disclose it, whether it comes to their knowledge by virtue of their position or for any other reason. Nor may they use such information for their own benefit or for the benefit of persons outside the organisation.

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The foregoing includes a prohibition on informing suppliers of quotations submitted by their competitors. In the event that a person outside the organisation requires information from the organisation for academic purposes, such information shall only be provided with the express written authorization of the employee's superior.

In the event that Government authorities require the disclosure of financial or any other type of information, the legal representative shall be informed of such requests for information and shall be provided with copies of the documents that will be submitted in response to such requests. In addition, the organisation may determine which data related to its operations shall be disclosed at its own free will, even if not legally required.

Article 17 – Protection of Information

The organisation is required to protect certain business information from persons, agencies and organisations that are not authorised to access information.

The organisation's policy is to maintain a high level of information security in order to conduct its activities free of risk and to adopt all necessary measures to ensure confidentiality and integrity of information. This implies an adequate protection of all the components of computer and telecommunications systems, i.e., information, software and equipment; it is also necessary to have processes and procedures in place to ensure the continuity of business operations in the event of damage or failures affecting the aforementioned systems.

The standards or procedures established to protect IT resources must support those described here and must be applied by all the organisation's employees. In addition to complying with these rules, they must:

- Obtain and protect information.
 - Be especially cautious in the care and protection of documents from Master Drilling Peru's archive.
 - Ensure compliance with legal regulations on accounting and correspondence files.
 - Gather, use and keep only information that is necessary for the organisation business. When personal information is needed, whenever possible, it should be obtained directly from the concerned party. Only recognized and reliable sources should be used to supplement such information.
 - Retain information for as long as necessary or as required by law, and such information should be physically secured and protected.
- Access to information
 - Before using stored information, all employees must request permission for access. Authorisation shall be granted and maintained by the requesting party for as long as there is a real need to know that information to perform his or her duties.
 - Employees shall protect information and software under their responsibility from loss, unauthorized use or disclosure.
 - Information relating to any product, plan or confidential business transaction of the organisation or personal information relating to employees, including their salaries, shall not be disclosed by any unauthorized employee unless and until proper authorization for such disclosure has been obtained.

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Article 18 – Ownership of Training Material

All material from training programs in which the organisation has invested and which the employee attends, belong exclusively to the organisation.

Article 19 – Intellectual Property

Technical and scientific developments, inventions, innovations, technological improvements and other work created by employees in relation to their duties or suppliers hired specifically for that purpose, which may need to be protected under the intellectual property regime, shall be the property of the organisation. As owner of the intellectual property rights, the organisation shall have the right to request its protection, pursuant to relevant legislation; and employees or suppliers must contribute to that end.

On the other hand, any work created by the employee or the contracted supplier, whether in the processes, systems, products or all those initiatives created as a result of their work or service to Master Drilling Peru, shall be the property of the latter, and may not be used by the employee or supplier for their own benefit or that of persons outside the organisation, unless expressly authorized by the owner (the organisation).

Anyone who has made an invention, discovery or improvement in a procedure and is going to provide services to the organisation, must state such situation in writing and as an appendix to the employment contract.

Article 20 – Acceptance of Positions

In order to accept positions as a member of the Board of Directors of any public or private, national or foreign entity, all employees shall inform their immediate superior, who shall inform the organisation's Integrity Committee. This Committee shall determine the existence or non-existence of a possible conflict of interest.

Employees who hold, or have been invited to hold, trustee or management positions outside the organisation must take special precautions to ensure that all the provisions of this code are complied with.

When business management positions outside the organisation are being considered, prior approval shall be obtained from the Integrity Committee.

Article 21 – Political Support

The organisation encourages employee participation in the political process and respects their right to absolute privacy in relation to their personal political activity and the conduct of political activities they freely decide to carry out, provided that such activities do not interfere with the performance of their duties and responsibilities and are carried out strictly on a personal basis.

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The organisation will not attempt to influence any such activity as long as there is no disruption to workplace activities and their political activities do not contribute to labour unrest.

The employee's relationship with Master Drilling Peru may not be involved or shown, and they may not use the name of Master Drilling Peru, its symbols, logos or any other sign that may be associated with it.

Any employee who wishes to run for political office or accept a political appointment must inform the Compliance Officer.

The organisation does not participate in political affairs of any kind or scope, except in the ways established by current legislation.

The organisation's funds, goods or services must not be used to promote or support political parties, or their candidates and the organisation's facilities must not be made available to any candidate or campaign.

The organisation is not responsible, in any case, for the actions of its employees in the performance of political activities. Their involvement in the above activities does not imply, in any case, a tendency, sympathy or political affiliation by Master Drilling Peru.

Article 22 – Donations

All donations or contributions for altruistic purposes made by the organisation must be made solely and exclusively to incorporated non-profit entities, or to those in the public or private sector that manage charitable initiatives.

Within this aspect, employees, as well as Senior Management and the Governing Body must comply with the procedure "Control of gifts, hospitality, donations and similar benefits" (MD-PCPL-005).

Article 23 – Additional Rules of Conduct

All employees of the organisation are required to:

1. Refrain from intervening in situations that allow, cover or facilitate the performance of unlawful acts or that may be used in a manner contrary to the public interest or that of Master Drilling Peru.
2. Report, by any of the formal means established in Master Drilling Peru, any irregular or unlawful act of another employee or person outside the organisation, which affects or may harm the interests of the latter.
3. Refrain from activities that represent direct competition with the organisation.
4. Refrain from conduct aimed at instilling fear, intimidation, terror, anguish, causing harm at work, generating demotivation at work, inducing resignation, mistreatment at work, persecution and discrimination of co-workers.
5. Treat privileged and confidential information, obtained in the performance of their duties, with the appropriate confidentiality.
6. Comply with regulations related to the prevention and control of money laundering and terrorist financing, as well as to report suspicious transactions related to such offences.

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Article 24 – Whistle Blower Channel

The Whistle Blower Channel is a mechanism and communication tool to address reports of activities that are actually or potentially contrary to law and this Code.

It aims to strengthen transparency in the organisation's operations and can be used by employees, suppliers, business partners, and persons outside of Master Drilling Peru.

Any type of actual or apparent situation that goes against the rules of conduct established in this Code and other activities carried out against the interests of Master Drilling Peru must be reported via the whistle blower channel.

Notwithstanding the possibility of resorting to direct reporting by the employee to his/her superior or the Compliance Officer, whenever appropriate.

Reporting is voluntary, anonymous and confidential, as it is not mandatory to provide personal data and may be made via the whistle blower channel of Master Drilling's website.

Article 25 – Human Rights

The organisation works to develop a corporate environment that promotes compliance with practices and behaviours aimed at respecting human rights, consistent with international treaties.

Article 26 – Other Employment

Employees may not be employed outside the company without the prior written approval of the General Manager.

Other employment shall be the exception and not the rule, and employees who wish to do so must have valid reasons.

Article 27 – Outside Activities

The organisation encourages employees to participate in activities outside the organisation, such as religious, charitable, educational and civic activities.

However, employees should avoid participating in any activities outside the organisation that may cause or are suspected of causing:

- An excessive demand on their time, attention and energy that would prevent them from putting their best effort into the work they perform for the organisation; or
- A conflict of interest; in particular, if the obligation, interest or distraction interferes or is suspected of interfering with their ability to use their judgment for the best interests of the organisation and its clients.

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Article 28 – Business Interests

Employees must not have a direct or indirect interest, with any business outside the organisation unless the General Manager has given his written consent.

Employees must not be involved, directly or indirectly, with any money lending business involving transactions between current employees of the company.

Article 29 – Remuneration

The organisation compensates employees in accordance with formal remuneration scales with agreed fringe benefits and any other regular remuneration.

No employee may receive fees or other remuneration related to the scale of any product or service provided by the company, unless specifically stipulated in the conditions of employment of such person.

Article 30 – Dealing with Third Parties and Other Organisations

With Suppliers and Organisations.

- The organisation strives to deal with third parties in a prompt, helpful and appropriate manner.
- Employees, when dealing with third parties, must be careful not to compromise the integrity or damage the reputation of any person, business, government body, or the organisation.

Media Relations.

- Employees must separate their personal roles from their position in the organisation when communicating with the public or media on issues that do not involve Master Drilling Peru's business. They must take special care not to be identified with the organisation when engaging in personal or political activities, unless the General Manager has previously authorized such identification.
- In addition to ongoing communication with third parties and other organisations, the organisation will occasionally be asked to express its views to the media on certain issues. When communicating publicly on issues involving the organisation's business, employees may not speak on behalf of the organisation on any issue unless expressly directed to do so by the General Manager.

Article 31 – Records of Organisation

Accurate and reliable records must be kept in order to comply with the organisation's legal and financial obligations and to manage the organisation's business.

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The organisation's records must reflect all business transactions in an accurate and timely manner. Undisclosed or unrecorded revenues, expenses, assets or liabilities are not permitted and employees responsible for accounting and record keeping functions are expected to be diligent in complying with proper practices.

Article 32 – Environmental Responsibilities

Health and Safety.

- The organisation is committed to taking all reasonable precautions to ensure a safe working environment for all employees.
- Employees, who become aware of circumstances related to the organisation's operations or activities that represent an actual or potential health or safety risk, must report it to their immediate superior or other authority as soon as possible.

Use of resources

- The organisation is committed to preserving resources used in its business operations. All employees shall endeavour to make efficient use of resources, reduce usage, reuse and recycle supplies and materials whenever possible.

Environmental Management.

- The organisation is committed to ensuring that appropriate measures are taken to limit the environmental impact of its business activities by incorporating pollution controls and waste management into operating procedures.

Article 33 – Labour Practices

All employees have the right to work in an environment free from any form of harassment or unlawful discrimination with respect to race, colour, sex, sexual orientation, national origin, citizenship, creed, political beliefs, age, marital or family status or disability. An employee must report any case of actual or suspected discrimination or harassment **to the Deputy Human Resources Manager**.

Ill or disabled employees shall retain their positions as long as they can perform their duties satisfactorily. When they are no longer able to perform their duties due to their health condition or disability, the company shall address their situation in accordance with the applicable labour legislation governing labour relations or collective agreements in force at the time.

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Article 34 – Breach of this Code

Master Drilling Peru takes any contravention of the code as a serious matter. Likewise, to the extent possible, any suspected or alleged contravention under investigation must be treated confidentially.

Any employee who fails to comply with any provision contained in this code, either actively or by omission of his or her duties, will incur a serious misconduct, which will be sanctioned in accordance with the provisions of the organisation's Internal Work Regulations. Certain violations of the code may also give rise to criminal, civil or professional proceedings.

If employees believe that their own actions have violated the code, they should inform their immediate superior and/or Human Resources Manager.

If employees suspect that another employee in the organisation has committed a violation of the code, they should report this immediately and confidentially, preferably in writing, to their immediate superior. They must not confront the concerned person.

The Compliance Officer and Heads of Department shall report in a timely and detailed manner any breaches of this Code of which they become aware, specifically those breaches related to bribery and, in general, to the provisions contained in this document.

In such report, the Compliance Officer shall establish the number of cases and the consequences, including sanctions and corrective measures generated by such breaches.

Article 35 – Duty to Consult

All employees must consult with their immediate superior or with the Compliance Officer of the organisation, their doubts regarding the application or non-application of a rule in a specific situation.

APPENDICES

- Appendix No. 01: Anti-Fraud, Anti-Corruption and Anti-Bribery Guidelines
- Appendix No. 02: Supplier Code of Conduct
- Appendix No. 03: Guidelines for the Prevention of Money Laundering and Terrorist Financing

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Appendix No. 01

Anti-Fraud, Anti-Corruption and Anti-Bribery Guidelines.

1. Purpose

To define corporate guidelines related to the prevention, detection, investigation and response to transnational bribery, corruption and fraud risks, in order to minimise the probability of occurrence of such risks.

2. Scope

The anti-fraud and anti-corruption guidelines apply to employees, business partners and third parties related to the organisation.

3. Reference Documents

- Act No. 30424, which regulates administrative responsibility of legal entities for transnational active bribery.
- Law 31740 Law that amends Law 30424, law that regulates the administrative responsibility of legal entities, to strengthen the anti-corruption regulations referring to legal entities and to promote good corporate governance.
- ISO 37001:2016 - Anti-Bribery Management System.

4. Terms and Definitions

- 4.1 Appropriation: Unlawful change of destination, misuse of financial resources and other assets of the legal entity and/or administered by it, to favour own or third-party interests.
- 4.2 Corruption: Abuse of positions of power or trust for private or third-party benefit, against the interests of Master Drilling Peru. The following is a description of some cases covered in this category, without limiting the existence of others:
 - ✓ Offering, requesting, delivering or receiving goods in money or in kind, services or benefits in exchange for actions, decisions or omissions.
 - ✓ Accepting any type of gifts for employees or their relatives.
- 4.3 False reporting: Creation, deletion, modification, alteration or disclosure of any type of information tending to distort the reality of one's own performance, that of the organisation, managers, employees or third parties. It includes the omission of information (affecting decision making). The following is a description of some cases covered in this category, without limiting the existence of others:
 - ✓ Providing false information to cover up poor performance or to gain access to bonuses.
 - ✓ Using false reports to deceive associates, financial entities, regulators or third parties in general.
 - ✓ Manipulation of financial statements: inappropriate revenue recognition, overstatement or understatement of assets, understatement of liabilities, significant estimates that are not in line with the business, among others.
 - ✓ Concealment and deliberate violation of foreign exchange, tax, accounting, occupational health and safety, environmental, in general of the regulations applicable to the organisation.

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- ✓ Concealment of accounting errors.
- 4.4 Fraud: any act, attempt or omission made intentionally to obtain an undue advantage, to the detriment of the principles and interests of Master Drilling Peru.
- 4.5 External fraud: fraudulent acts carried out by persons outside the organisation, such as suppliers, contractors, clients and third parties in general.
- 4.6 Internal fraud: fraudulent acts carried out within Master Drilling Peru by its employees, directors, managers or representatives.
- 4.7 Improper handling of information assets: Creating, accessing, deleting, modifying, altering, disclosing or using information assets inappropriately for improper purposes or for personal benefit. The following is a description of some types of information assets covered in this category, without limiting the existence of others:
 - ✓ Digital information assets: structured and unstructured information stored in or transmitted by Information Technology (IT) elements, with a value assigned by the organisation, which needs to be protected.
 - ✓ Information assets in other physical and/or electronic media (videos, microfilms, etc.): structured and unstructured information stored in media other than digital, with a value directly assigned by the organisation, which needs to be protected.
 - ✓ IT elements: elements, media or resources that support the management of digital information asset. This includes, but is not limited to: workstations, operating systems, mobile devices, printers, software, storage media, servers, user accounts, Internet browsing, networks, e-mail, file transfer service, among others.
- 4.8 Transnational Bribery: Act by which employees, managers, associates or third parties linked to any of the legal entities that are part of the organisation, give, offer or promise to a foreign public servant, directly or indirectly: (i) sums of money, (ii) objects of pecuniary value or (iii) any benefit or utility, in exchange for said public servant performing, omitting or delaying any act related to his/her duties and in relation to an international act, business or transaction.

5. Responsibilities

5.1 Employees of the Organisation

Are responsible for proper risk management, as well as the application of principles of self-control or self-evaluation as part of their daily activities, seeking to strengthen the operation of legal entities that make part of Master Drilling Peru.

Must remain attentive to any indication of fraud, corruption and bribery that may occur within his/her working area or another area of Master Drilling Peru and must inform or report doubts or suspicions of possible fraudulent acts and collaborate with the investigations using the means provided for this purpose.

5.2 Business Partners

Who identify possible events of fraud, corruption or bribery must:

- ✓ Report them immediately using the available communication channels.
- ✓ Avoid contacting the possible person involved.
- ✓ Exercise due caution and allow the appropriate authority to conduct investigation.

5.3 Compliance Officer

- ✓ In charge of supervising the application of rules and procedures established in the Organisation's anti-fraud, anti-corruption and anti-bribery guidelines.
- ✓ He/she will support investigations of fraud, corruption or bribery that will be coordinated, carried out and documented, individually or jointly, as appropriate, by the person

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responsible for the process in which the event occurs, who will also be supported by the Integrity Committee.

- ✓ If investigations reveal the existence of an event of fraud, corruption or bribery in any process, the Compliance Officer, with the support of the Integrity Committee, will issue an investigation report containing conclusions, corrective measures and opportunities for improvement.
- ✓ Within 15 days after the end of each six-month period, the Compliance Officer shall provide the Senior Management and the Governing Body with a detailed account of allegations received, results of investigations, measures taken and resulting improvement actions. Members of said Committee shall assist in managing and providing advice as deemed pertinent.

6. Description

For the organisation, ethics is a differentiating and strengthening principle in its business, which implies that it is managed within the highest standards of transparency and good business practices, and a culture of prevention and management of fraudulent actions in place.

Consequently, we have established the following general criteria, which define our willingness to act to prevent, detect, investigate and respond to potential fraudulent or corrupt acts. These criteria are mandatory and shall not be subject to discretionary interpretation or application:

The organisation:

- a) Does not tolerate fraud, corruption or bribery actions; furthermore, it takes the necessary measures to combat them, through adequate mechanisms, systems and controls that enable the prevention, detection and response to these conducts.
- b) Integrates and coordinates a set of actions necessary to prevent and combat possible situations of fraud, corruption and bribery, as a fundamental element and consistent with the other policies of the organisation.
- c) Fosters an environment of transparency, integrating different systems developed for the prevention and detection of fraud, corruption and bribery, maintaining appropriate channels to encourage reporting of such matters in Master Drilling Peru.
- d) Promotes action under the guidelines of legislation in force in each place where the organisation has a presence, under the internal regulations of Master Drilling Peru and, in particular, under the guidelines established by the "Code of Ethics and Conduct".
- e) Promotes a culture based on the principle of "zero tolerance" to fraud, corruption and bribery, and the principles of ethics and responsible behaviour of the organisation's employees, regardless of their hierarchical level.
- f) Identifies, develops and implements adequate procedures for the prevention, detection and treatment of fraud, corruption and bribery in legal entities that are part of the organisation, and works for its continuous improvement.
- g) Emphasises proactive activities, such as prevention and detection, prioritising them over reactive activities, such as investigation and sanction.
- h) Investigates any allegation or act of fraud, corruption or bribery, regardless of the amount and as soon as possible, ensuring the confidentiality of the investigations carried out.
- i) Guarantees the fair application of sanctions in accordance with the provisions of the respective legislation and internal regulations and policies, and also initiates the appropriate legal actions to enable competent authorities to act and enforce relevant legislation.

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- j) Promotes and is attentive to listen, analyse and investigate any act or suspicion of actions related to fraud, corruption and bribery known to employees, clients, suppliers and other related groups.
- k) Empowers and supports the Compliance Officer and the areas supporting his/her work, to take the necessary steps to ensure compliance with anti-fraud, anti-corruption and anti-bribery guidelines, providing him/her with the necessary resources and means to do so.

7. Other Considerations

- 7.1 Presumption of good faith. As a general principle, all employees and third parties associated with the organisation are presumed to act in good faith. When a person files a report of fraud or suspected fraud, it is presumed that he/she does so in good faith and based on reasonable indications or elements.
- 7.2 No retaliation. The person reporting any actual or potential action that goes against the guidelines of the Code of Ethics and Conduct shall not be subject to retaliation, threats, discriminatory measures or sanctions of any kind. However, when it is proven that the whistle blower acted maliciously and based on false facts, in order to harm the reported person, Master Drilling Peru reserves the right to apply the measures and sanctions that law and internal regulations provide for such acts.
- 7.3 Confidentiality. All employees who, due to the process they are in charge of or any other circumstance, participate in or become aware of any investigation that is taking place or has taken place within the organisation, is required to treat the information they know confidentially and to protect the anonymity of those who have submitted any report. In this regard, the investigation results may not be disclosed or discussed with persons who do not have a legitimate need to know them, nor by employees who are not authorised to do so. Recipients of reports, derived from the investigation and analysis process, are determined by the Integrity Committee.
- 7.4 Penalties. Management personnel and employees of the organisation who engage in fraudulent conduct will be sanctioned in accordance with the "Internal Work Regulations" of Master Drilling Peru, without prejudice to the pertinent legal actions that apply to the offense committed, including, by way of example, but not limited to: acting negligently or in bad faith in the face of risk situations and weaknesses in the internal control system, covering up any act against corporate principles and values, making false or malicious reports against any person, censuring colleagues who report a fraudulent act, obstructing investigations or deliberately omitting to implement action plans that seek to mitigate fraud, or taking individual actions without the regular channels defined in this document.
- 7.5 Compliance Officer. Employee with leadership, trust and management functions, designated by the organisation's Governing Body for the supervision and proper compliance with anti-corruption, anti-fraud and anti-bribery guidelines. The Compliance Officer shall be a leader, with integrity and experience, with autonomy and resources to implement his/her management and direct access to Senior Management.

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Appendix No. 02

Supplier Code of Conduct

1. Purpose

The organisation is committed to standards of excellence in every aspect of its activities, ethical and responsible conduct, as well as respect for the rights of people and the environment. These commitments are part of the culture based on values of trust, transparency, reliability and impartiality in relations with its suppliers, employees and clients.

Therefore, this Code of Ethics and Conduct is also applicable to suppliers of goods and services of the organisation, which refers to the minimum responsibilities they must comply with.

To formalise a business relationship with the organisation, supplier agrees to comply with this Code, and its compliance may be verified at any time.

2. Selection and Procurement

Suppliers of goods or services shall be selected and procured in accordance with the criteria of free competition in the market and improvement of efficiency and institutional profitability, within the principles of respect, loyalty and good faith, as well as sound business practices.

We will only contract with legally constituted suppliers, who comply with and promote the following with their own suppliers, subcontractors and other business partners:

2.1 Human rights and proper working conditions.

Suppliers shall protect universally recognised fundamental human rights within their sphere of responsibility and influence and ensure that their companies do not allow violations of these rights. In addition, they shall ensure that their employees are treated with dignity and respect, which includes the following obligations:

- ✓ Not to employ child labour.
- ✓ Not to discriminate against their employees by word or action, for reasons of race, gender, language, religion, sexual orientation or disability.
- ✓ Respect freedom of association.
- ✓ Comply with applicable labour standards, among which is compliance with those that refer to:
 - a) Working hours.
 - b) Payment of fair salaries and social benefits within legal parameters.
 - c) Compliance with social security system affiliations.

2.2 Quality.

Suppliers shall comply with current quality standards, as applicable, for goods and services supplied to the organisation.

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2.3 Environment.

The supplier shall comply with environmental standards, shall seek ways to minimise the environmental impact in all its operations, and shall work towards continuous improvement and the implementation of management systems that favour the optimal use of natural resources.

2.4 Occupational Health and Safety.

Suppliers shall provide a safe and healthy work environment for their employees, including controls, work procedures and adequate industrial safety equipment, in accordance with the types of risks inherent to their activity and in general in compliance with the provisions of the relevant standards.

Representatives of suppliers working at any of the organisation's offices shall respect and abide by the organisation's safety rules and standards.

2.5 Anti-Corruption and Anti-Bribery Guidelines and Procedures.

In the development of relations between the organisation and suppliers of goods or services, we expect the following principles to be applied in accordance with our corporate philosophy:

- a) Negotiations and operations with our stakeholders shall be conducted with ethics, transparency, respect and corporate social responsibility. Fraud and corruption will not be tolerated.
- b) Laws, provisions and regulations issued by relevant authorities, if any, shall be strictly complied with.
- c) Suppliers of goods or services shall not accept or promote any form of corruption, including extortion and bribery, and undertake to report these acts and take preventive actions in this regard.
- d) They shall not negotiate, accept, or pay any value for situations such as extortion and all those acts that are not carried out within the framework of the law. Such acts shall be reported to the authorities.
- e) We shall not have any type of relationship with illegal groups to carry out our activities.
- f) We shall not deal with suppliers of goods or services who are involved in human rights violations.

3. Gifts and Courtesies

Suppliers of goods or services shall not give courtesies or gifts intended to inappropriately influence a business decision or relationship. Similarly, they shall refrain from accepting such gifts or courtesies from employees that are intended to do so.

4. Conflict of Interest

A supplier who is, or appears to be, in a situation of conflict of interest must ensure that the organisation is aware of the conflict of interest before entering into any relationship with the organisation.

A direct or indirect conflict of interest is also caused in the following cases:

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- ✓ Economic participation of an employee of the organisation or his/her spouse, permanent partner or person related up to the second degree of consanguinity or affinity, or first degree of kinship by law, in a company that supplies goods or services to the organisation, when the employee is responsible for the business relationship.
- ✓ Granting or receiving loans from employees responsible for the business relationship.
- ✓ Having a relationship with an employee that prevents ensuring the principle of objectivity in the business relationship.
- ✓ Offering employees of Master Drilling Peru exclusive or preferential discounts in personal business, except when the organisation has authorized purchase plans.

If it is not possible to foresee a conflict of interest, it will not be considered that the employee or supplier shall not be considered to be in contravention for not declaring it. But as soon as he/she becomes aware of its existence, he/she must declare it as defined in the organisation's "Code of Ethics and Conduct."

5. Protection of Information

All information given to and shared with suppliers as a result of a business relationship is confidential and may only be disclosed with the express authorisation of the organisation and, where appropriate, the signing of a confidentiality agreement will be requested.

6. Whistle Blower Channel

The organisation has a whistle blower channel on Master Drilling website, where misconduct can be reported.

Suppliers and employees undertake to use this channel to report any misconduct they identify that goes against the "Code of Ethics and Conduct" of the organisation and its Appendix No. 02 "Supplier Code of Conduct."

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Appendix No. 03

Guidelines for the Prevention of Money Laundering and Terrorist Financing

1. Purpose

To define guidelines for the prevention and control of money laundering and terrorist financing risk management, in order to reduce the possibility that the organisation, in the development of its activities, be used directly or indirectly for concealment, handling, investment or use of any form of money and other assets derived from illicit activities.

These guidelines are in accordance with the "Code of Ethics and Conduct", the organisation's related policies, relevant regulations and industry practice.

2. Scope

This applies to all Master Drilling Peru personnel and related third parties.

3. Reference Documents

- Legislative Decree No. 25475. It establishes penalties for terrorist acts and procedures for investigation, prosecution and trial.
- Legislative Decree No. 1106. On the effective fight against money laundering and other offences related to illegal mining and organised crime.
- Act No. 27765. Criminal Law Against Money Laundering.
- Plenary Agreement 3-2010/CJ116
- Guide for ML/TF Risk Management in the foreign exchange trading sector.

4. Terms and Definitions

4.1 Terrorist Financing

Terrorist financing is an autonomous offence consisting of the provision, contribution or collection of funds, financial or economic resources or financial services or related services to commit:

- ✓ Any of the offences provided for in Legislative Decree No. 25475;
- ✓ Any of the terrorist acts defined in treaties to which Peru is a party, or
- ✓ Their purposes or securing the existence of a terrorist group or individual terrorists. Funds or resources, unlike money laundering, may be of licit or illicit origin.

4.2 Risk Factors

Risk factors are agents that give rise to the money laundering and terrorist financing risk.

Current regulations establish three main risk factors that exchange houses need to identify and take into account, as appropriate:

- ✓ Clients: Risks related to behaviour, background and activities of clients, at the beginning and throughout the business relationship.
- ✓ Services: Risks related to distribution channels, means of payment, new technologies and changes in the nature of services.
- ✓ Geographical area: Risks related to security, economic-financial and socio-demographic characteristics and regulations of competent bodies, both locally and internationally.

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4.3 Risk Management

Constant effort to develop policies, processes and procedures, with a risk-based approach, in order to prevent materialisation of money laundering and terrorist financing risks, detect unusual or suspicious situations and report them in a timely and effective manner.

4.4 Money Laundering

The offence of money laundering can be defined as follows:

The offence of money laundering is any act, performed by any person, to convert, transfer, conceal, hold, transport assets in the form of money, goods, effects or proceeds of illicit origin. The person performing such act knows or should have presumed this illicit origin and performs this act with the purpose of avoiding the identification of its origin, its seizure or confiscation by the justice system.

Such conduct is drastically penalised. Any person who commits the acts of converting, transferring and/or hiding illicit assets, is liable to a prison sentence of not less than 8 nor more than 15 years, and additionally to a fine equivalent to 20 to 350 days.

The criminal content of the offence of money laundering foreseen in Articles 1, 2, 3 of Legislative Decree No. 1106 preserved the internal substantive structure of the previous Act No. 27765 dated June 20, 2002 called "Criminal Law Against Money Laundering," establishing that the offence of money laundering requires the following elements to be identified:

- ✓ Active Subject: Can be executed by any person, no special qualification is required, it can also be committed by the same person who was involved in the previous criminal activity (self-laundering).
- ✓ Passive Subject: The Government is always negatively affected by this type of act and is represented by the Public Prosecutor's Office of Money Laundering.
- ✓ Previous Criminal Activity: There must be prior criminal activity, suitable for generating assets. It can be the offence of illicit drug trafficking, corruption of officials, human trafficking, and others with the capacity to generate illicit profits.
- ✓ Typical Conduct: Acts of conversion, transfer, concealment and possession.
 - a) Act of conversion means to transform or mutate partially or completely the illicit asset. This is referred to as placement stage.
 - b) Act of transfer means to move the converted assets away from their illicit origin and from their first transformation. This is referred to as layering stage.
 - c) Act of concealment and holding means a conduct that conceals the nature, origin, location, destination, movement or rights of assets already converted or transferred. This is referred to as integration stage. The criminal law has established the following acts of concealment and possession:
 - ✓ Acquire: Purchase or obtaining ownership and control of property for valuable consideration.
 - ✓ Use: Direct or indirect possession of property involved in the offence.
 - ✓ Keep: External physical protection of property.
 - ✓ Manage: Management or conduction of assets already laundered.
 - ✓ Custody: Surveillance over assets that may be concealed.

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- ✓ Receive: Transfer of property that recipient incorporates into his/her physical possession.
 - ✓ Conceal: Concealing the actual origin of criminally obtained assets.
 - ✓ Keep in possession: Holding or possession of recycled goods, openly carried out by the agent.
- d) Subjective Aspect: It refers to the subjective component of the criminal offence, which only admits perpetration on the basis of direct or possible malice, i.e., direct or presumed knowledge of the illicit origin of assets.

4.5 Suspicious Transaction

Transactions involving handling of assets or liabilities or other resources, the amount or characteristics of which are not related to the economic activity of its clients, or transactions of its users which, due to their number, the amounts transacted or their particular characteristics, may reasonably lead to suspect that the regulated entity is being used to transfer, handle, take advantage of or invest resources coming from criminal activities or destined to their financing.

4.6 Unusual Transaction

Transactions carried out or intended to be carried out, which amount, particular characteristics and periodicity are not related to the economic activity of the client or are outside the normal parameters of the market or have no obvious legal basis.

4.7 Associated Risk

An associated risk is the materialisation of money laundering and terrorist financing risk, and is generally of the following types:

- ✓ Reputational: Possibility of loss incurred by an entity due to loss of prestige, bad image, negative publicity, causing loss of clients, decrease in revenues or legal proceedings.
- ✓ Legal: Possibility of loss incurred by an entity being sanctioned or obliged to compensate damages, as a result of non-compliance with rules or regulations, as well as contractual obligations.
- ✓ Operational: Possibility of losses due to deficiencies, failures or inadequacies in human resources, processes, technology, infrastructure or the occurrence of external events.
- ✓ Contagion: Loss that a regulated entity may suffer, directly or indirectly, due to an action or experience of any person or related company.

5. General Conditions

5.1. Employee Performance Criteria

General criteria to comply with the duties and obligations of management personnel and all employees for the prevention of money laundering and terrorist financing, include:

- a) Knowledge of related third parties.
- b) Confidentiality of information: No employee of the organisation may disclose to related third parties, directly or indirectly, information on the control and analysis procedures that, in terms of prevention of money laundering and terrorist financing, they practice in their operations, as well as the content of the reports sent to the competent authorities.

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5.2. Guidelines related to Suppliers

The development of relations between the organisation and its suppliers is based on the following:

- a) We act ethically, with respect and corporate social responsibility.
- b) We operate in strict compliance with the law and in collaboration with the competent authorities.
- c) We practice good corporate governance, and this is reflected in our values towards clients, suppliers and other stakeholders.
- d) We manage risks in a responsible manner.

5.3. We are responsible for the implementation and verification of compliance with the guidelines for the prevention of money laundering and terrorist financing.

The Governing Body of Master Drilling Peru appoints the person responsible, called the "Compliance Officer," and has the power to appoint the deputy officer.

In defining the framework of action of the Compliance Officer, we also take into account what is established by control entities and governmental authorities.

Duties are those specified in the Guidelines for the Prevention of Money Laundering and Terrorist Financing.

5.4. Obligations and prohibitions applicable to the organisation's employees.


In accordance with the legal provisions in force, natural and legal persons are required to observe measures contemplated therein, aimed at avoiding all types of acts related to money laundering and terrorist financing.

The specific obligations of employees directly linked to the organisation are described in the document Guidelines for the Prevention of Money Laundering and Terrorist Financing of Master Drilling Peru.

Failure to comply with the obligations contemplated in these guidelines may result in the penalties established in the legal regulations and internal rules of the organisation, including the "Internal Work Regulations."



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Approval			
ITEM	PREPARED BY	REVIEWED BY	APPROVED BY
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