




WATER ADVANCED SOLUTIONS	CODE OF ETHICS	Rev. 1
		November 30, 2023

CODE OF ETHICS

DOCUMENTATION SG-PROCEDURES		
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1. OBJECTIVE.

WAS S.A.C considers that ethics, honesty, integrity and loyalty are essential values that guide all its activities.

This Code of Ethics describes the principles and acts intended to respect the commitment of WAS S.A.C to prohibit, without reservation, any form of bribery or similar behavior and to abide by regulations and best practices in this field. The Code is an integral part of WAS S.A.C's existing internal policies and procedures, which must also be respected.

2. SCOPE.

The Code of Ethics applies within all operations of WAS S.A.C within Peruvian territory.

The provisions of this Code shall apply directly and personally to all managers or workers of WAS S.A.C , its interested parties (suppliers, contractors, customers, etc.), mainly to anyone who may compromise or represent WAS S.A.C.

3. REFERENCE DOCUMENTS.

3.1.INTERNAL DOCUMENTS.

- 3.1.1. Anti-bribery policy.
- 3.1.2. Gift Policy.
- 3.1.3. Anti-bribery management system manual.
- 3.1.4. Procedure for managing concerns and investigations.

3.2. EXTERNAL DOCUMENTS

- 3.2.1. ISO37001:2016 Anti-bribery management systems. Requirements for its orientation and use.
- 3.2.2. Law No. 30424 – Law regulating the administrative liability of the legal person.

4. RESPONSIBILITIES.

4.1. COMPLIANCE OFFICER.

Receive the suspicion of non-compliance with the code for further treatment.

Resolve queries about conflicts of interest and other issues related to the code.

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4.2. MIDDLE AND HIGH MANAGEMENT. (MANAGERS AND BOSSES)

Receive information from people who are offered gifts and invitations that may raise doubts.

Receive the suspicion of non-compliance with the code formulated by the manager or worker and subsequently report it to the Compliance Officer.

Apply all the provisions, guidelines and obligations of this code of ethics.

4.3. LOW CONTROLS

Receive information from people who are offered gifts and invitations that may raise doubts.

Receive the suspicion of non-compliance with the code formulated by the worker and subsequently report it to the Compliance Officer.

Apply all the provisions, guidelines and obligations of this code of ethics.

5. TERMS AND DEFINITIONS

5.1. Final beneficiaries:

It is the natural or legal person that directly or indirectly controls the assets and for whom or for whom the activities of WAS S.A.C. are carried out.

5.2. Gift:

Any benefit, good or service that can be valued in money transferred voluntarily and free of charge directly or indirectly. These may be species or similar, articles, checks, gifts, movable or immovable property, etc.

5.3. State procurement:

It concerns public procurement, concession contracts and other contracts intended to cover a need in the public interest.

5.4. Conflict of interest:

Situation where business, financial, family, political or personal interests could interfere with the value judgment of personnel in the performance of their obligations towards WAS S.A.C.

5.5. Invitation:

Proposal to participate in an event, conference, trip, dinner, etc.

5.6. Patronage:

It consists of supporting organizations or works of general interest (foundations, non-profit associations, etc.) by donating an amount of money, real estate or a loan.

5.7. Current operation:

Transaction or task related to the exercise of the activities of WAS S.A.C

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carried out periodically.

5.8. Sponsorship:

Material support to an educational, cultural, scientific, social, humanitarian or sports project in order to contribute to promoting the image of WAS S.A.C.

5.9. Business Partner:

It is a person or company with which WAS S.A.C establishes a commercial relationship.

5.10. Politically exposed person:

A natural person who exercises or has exercised a public function or who has had a close relationship with a public official.

5.11. Unfair competition practices:

Any act intended to restrict or undermine free competition and thus circumvent the rules of transparency, loyalty and fairness between competitors. In particular, these may be express or tacit agreements, concerted actions or abuse of a dominant position which makes it possible to exclude other competitors.

5.12. Evaluation procedure:

Regular control measures and reasonable verification of WAS S.A.C for the identification of the third party and the risk to which WAS S.A.C is exposed when establishing a commercial relationship with said third party.

5.13. Compliance Officer:

Responsible person appointed by the General Manager, who ensures the proper implementation and functioning of the anti-bribery management system.

5.14. Influence peddling:

It is the act, on the part of a person, of using or abusing his real or supposed influence in order to obtain from a public authority (national or international) distinctions, jobs, contracts, exemptions or any other favorable advantage.

5.15. Research:

Set of investigations necessary to determine whether or not there is non-compliance with the rules of the code.

6. APPLICATION OF THE CODE, KNOWLEDGE AND COOPERATION.

The directors or employees of WAS S.A.C must ensure that, as far as possible, each business partner with whom WAS S.A.C establishes a business relationship (supplier, client, partner, non-profit organization, etc.) applies the provisions of this Code or at least equivalent provisions at minimum levels.

Managers or workers of WAS S.A.C who fail to comply with this Code, or managers who, as a result of their manifest incompetence in terms of control and monitoring, were responsible for such breaches, could be subject to disciplinary actions, which could even lead to dismissal or termination of their contractual

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relationships (tied and aligned with the Internal Regulations of the Worker -RIT).

In order to ensure compliance with the provisions of this Code, WAS S.A.C may at any time carry out a more detailed examination of any operation carried out on its behalf or under its responsibility. In the context of these examinations, WAS S.A.C requires persons under its authority, as well as persons acting on its behalf and on its behalf, to cooperate with it and with any external advisor it has appointed, if necessary. Any failure to cooperate in the context of such reviews may lead to disciplinary or contractual action.

For the correct application of these provisions, WAS S.A.C provides training and resources to the people involved; Each worker may apply to benefit from them and each hierarchical and functional manager must ensure that the persons under his authority have undergone the training adapted to his situation. On the other hand, WAS S.A.C undertakes to provide its help to each person involved for the correct application of this Code, which any manager or worker may therefore request the advice of his hierarchical authority, of the Compliance Officer on which he depends so that he can help him understand his obligations and fulfill them; whenever necessary and as far as possible, WAS S.A.C undertakes to respect the confidentiality of this management.

7. PREVENTION AND PROHIBITION OF ACTIVE CORRUPTION AND SIMILAR BEHAVIOUR.

a. Active corruption and similar behaviors.

WAS S.A.C formally prohibits any act of corruption, both of each person exposed politically and in front of a company or an individual, as well as any other act that may resemble such behavior, in particular influence peddling. In general, WAS S.A.C prohibits any behavior that consists of trying to obtain any favor from a third party in exchange for an illicit, promised, consented or alleged advantage.

In the case of corruption, 'facilitation payments', i.e. illicit and/or hidden payments to ensure or speed up administrative management, are prohibited, even if the objective to be achieved is legitimate.

Acts of complacency consisting in granting a favour to a third party (e.g. employment, a contract for the supply of goods or services) without proven economic justification or outside the framework of the social or humanitarian actions undertaken by WAS S.A.C, specifically in the context of its sponsorship or patronage actions (see below), are also prohibited.

b. Tendering and awarding of contracts

WAS S.A.C prohibits any practice that tends or leads to restricting the freedom of access and equality of candidates in the context of public procurement, as well as the free and fair exercise of competition.

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In this sense, any action that, outside the regulatory or particular framework that applies to consultation, seeks to improperly obtain information from the contracting party and, in general, obtain an unjustified advantage is prohibited in particular.

Any action that tends or leads to the restriction of competition, in particular in the context of an unlawful agreement with one or more candidates or any other unfair competition practice, is also prohibited.

c. Political activities and contributions.

WAS S.A.C prohibits any political activity or contribution to a political party to a candidate in an election. No manager, worker or third party may commit WAS S.A.C or use, in any way, the means of WAS S.A.C in such activity or contribution.

The political activities and contributions involved include, in particular, any membership and benefit or gift (in cash or in kind) to an organisation or political party or even to a person engaged during a local or national political campaign.

d. Gifts and invitations offered to third parties (customers, suppliers, partners, public or private authorities)

The directors or workers of WAS S.A.C, as well as those third parties acting in the name and on behalf of WAS S.A.C, may be in the situation of having to offer gifts or invitations as a courtesy to business partners. Those who offer them must do so only in the interest of WAS S.A.C, within the limits of its attributions and delegations, in favor of an identified and known person, and clearly mention that it is WAS S.A.C who makes said gift or invitation.

- They shall be discerning and take into account the commercial circumstances justifying the gift or invitation, as well as the charge of the person receiving the gift or invitation. These gifts or invitations must be of a reasonable nature and value and both WAS S.A.C and the person receiving them must be able to assume them publicly. They cannot be considered as influencing a decision affecting WAS S.A.C.
- On the other hand, managers and employees must rigorously ensure that both the nature and the amount of these gifts and invitations comply with local laws and regulations, in particular when the person receiving them exercises a public and/or elective function.
- WAS S.A.C formally prohibits offering any gift or invitation under conditions that are intended to disguise the existence of said gift or invitation or whose nature could contravene decency or take a financial or quasi-financial form (cash, gift vouchers, travel coupons or negotiable movable property, loans, etc.).
- WAS S.A.C. formally prohibits offering any gift or invitation to any client of

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public entities.

Within the limits set out in this Code and, if applicable, applicable legal rules, managers of subsidiaries or premises may, in agreement with their hierarchical authorities and with the consent of the Compliance Officer, set indicative or mandatory thresholds.

It is delivered/received if WAS S.A.C designates up to US\$ 100 as a gift with the prior authorization of personnel assigned in the organization. Except for public sector customers, absolutely nothing is delivered or received.

8. PREVENTION AND PROHIBITION OF PASSIVE CORRUPTION AND CONFLICTS OF INTEREST IN WAS S.A.C.

a. Passive corruption

WAS S.A.C formally prohibits all its managers or workers and third parties acting on its behalf or on its behalf from any form of passive corruption, that is, the fact of requesting or accepting an illicit or hidden advantage, regardless of the nature or amount, in exchange for a favorable act by WAS S.A.C or a third party.

b. Conflict of interest

No decision taken on behalf of WAS S.A.C shall be associated with any apparent or actual conflict of interest. Such conflicts may arise in particular when the personal interests (pecuniary, family) of a manager or employee of WAS S.A.C, or of a third party acting on his behalf or on his behalf, are potentially or effectively affected by a matter dealt with within the framework of his duties in WAS S.A.C.

Any person who may be in such a situation shall, before initiating any action or, at least, as soon as he becomes aware of the situation of conflict of interest, immediately inform his hierarchical superior thereof in writing and refrain from taking any action until an express authorization is issued, where applicable, with conditions. When the conflict situation affects a managerial or higher position, such authorization may only be issued after formal consultation with the Compliance Officer or the Director of Regulatory Compliance of WAS S.A.C.

In situations requiring special confidentiality (in particular in cases of matters related to private life), the person involved in the conflict may consult directly with the Compliance Officer WAS S.A.C undertakes to examine the matter in a strictly confidential manner and to provide assistance so that the conflict situation can be resolved by limiting as much as possible the damage to the interests of WAS S.A.C and the person concerned.

c. Gifts and invitations received

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Managers and employees, as well as third parties acting in the name and on behalf of WAS S.A.C may be obliged, subject to the following rules, to receive gifts or invitations as a sign of courtesy from business partners.

WAS S.A.C categorically prohibits:

- ☐ Any form of solicitation of gifts or invitations;
- ☐ Any gift or invitation received in a hidden manner or by an unknown or precisely unidentified person;
- ☐ Any gifts or invitations received in cash or similar form (e.g. cheques or negotiable items);
- ☐ Any gift or invitation that violates applicable local regulations (in particular by reason of its amount, its nature, the person granting it or the person receiving it);
- ☐ Any gift or invitation that was against decency.

On the other hand, gifts and invitations may only be accepted if they are of reasonable value and nature depending on the circumstances and the person offering or receiving them; In any case, they must be able to be assumed publicly, both by the person who grants them and by the person who receives them. Within the limits set out in this Code and, if applicable, applicable legal rules, managers of subsidiaries or premises may, in agreement with their hierarchical authorities and with the consent of the Compliance Officer, set indicative or mandatory thresholds.

Persons who are offered gifts and invitations that may raise doubts (in particular as to their value or nature or in the circumstances) should immediately inform their superior and, where appropriate, the Compliance Officer.

The gift or invitation that does not comply with the above rules must be rejected and, if applicable, returned (the Compliance Officer will discuss with the superiors the measures that must be taken if this return is material or reasonably impossible).

9. OTHER RISK situations subject to PARTICULAR rules.

a. Sponsorship and patronage.

Sponsorship and patronage actions consist of economic or in-kind support for non-commercial purposes (philanthropic, humanitarian, social, cultural, etc.) for the benefit of events or organizations. Such actions may only be carried out in the name and on behalf of WAS S.A.C within the strict framework provided for by the internal policies and procedures of WAS S.A.C and are expressly subject to prior authorization. They must only be used to promote the brand or image of WAS S.A.C and must only be carried out with and/or in favor of legitimate organizations whose reputation cannot be questioned from an ethical point of view.

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The directors and workers of WAS S.A.C must strictly ensure that these sponsorship and patronage operations cannot be unduly exploited in favor of the personal interests of a third party and, in particular, of a person who holds a public office or who is notoriously a candidate or possible candidate for such position. In case of doubt, the operation should be interrupted without delay and the Compliance Officer notified.

b. Lobbying.

Lobbying consists of exercising an activity of representation of interests before a public authority to promote the image, products and services of WAS S.A.C or its companies or entities.

The lobbyist representative may be a manager or employee of WAS S.A.C or a third party acting on its behalf within the framework of a contractual mission; Where appropriate, their good reputation shall be assessed in accordance with the procedures laid down in point (c) below. Regardless of the name given to this lobbying activity, it must be carried out under conditions in accordance with ethics and this Code and strictly avoiding any risk of influence peddling.

Lobbyists must make it clear to the persons with whom they have dealt and to third parties that they are acting on behalf of WAS S.A.C and try to avoid any confusion with other activities which may be carried out privately, professionally or in the context of any position (associative, political or trade union).

With regard to the persons with whom they have dealt and their immediate environment, representatives of lobbyists acting on behalf of WAS S.A.C must refrain from any attempt to obtain information by fraudulent means, from any deliberate communication of false or misleading information.

In Peru, with regard to some national or international persons or institutions, special regulations impose obligations on this lobbying activity in relation to, in particular, the persons exercising the mission, the modalities of the mission, or the persons with whom they have dealt (in particular parliamentarians and elected officials). It is for each task force officer in the lobbying group (whether it is carried out by a manager or employee of WAS S.A.C or by a third party) to verify whether the task in question could be subject to such regulations and, if necessary, to ensure that the terms are strictly complied with.

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c. Intermediaries, suppliers and partners.

WAS S.A.C understands that the activity of its business partners (customers, suppliers, service providers, intermediaries, etc.) cannot pose a risk to it, specifically in case of non-compliance by the latter with international and national regulations and recognized good practices in the prevention of corruption and similar behavior.

In this context, the directors and employees of WAS S.A.C must ensure that any business relationship with one of these partners is subject to a prior and reasonable assessment in view of the risk it presents, in particular in terms of corruption and similar behaviour. The agreements signed with them must include specific stipulations requiring respect for good practices in this area and provide that the third party's proven failure to comply on this point may constitute a cause of immediate termination of relations.

It is up to the person responsible for the commercial relationship to ensure the good reputation in these matters of the selected partners. In case of doubt, you must notify your superiors and the Compliance Officer without delay so that WAS S.A.C can carry out an evaluation procedure. In order to prevent any risk of corruption, this evaluation procedure is recommended in any commercial relationship, regardless of tenders or current operation, with a person from the political milieu.

Unless it is an absolute urgency and expressly validated by the General Manager, provided that an evaluation is carried out (in particular in cases where the internal procedures of WAS S.A.C provide for an obligation in this regard, such as in matters of intermediation or commercial advice), no contractual commitment can be assumed without the validation of the General Manager, on the basis of the results of that evaluation, by the authorised person in charge.

d. Rules relating to accounting and financial control.

The rules and procedures established by WAS S.A.C in terms of accounting and financial control are specifically intended to ensure that books, records and accounts are not used to conceal illegal acts and in particular corruption or influence peddling. To this end, any payment or benefit consented to on behalf of WAS S.A.C must have a lawful and defined purpose in favor of final and known beneficiaries respecting, in particular:

- international legislation on sanctions, embargoes, prevention of money laundering and terrorist financing,

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- delegations of commitment powers and banking powers issued in accordance with the WAS S.A.C. procedure,
- the validation/approval circuits (order, delivery, payment) and accounting described in the procedures Purchase of WAS S.A.C.

Any hidden payment, i.e. not recorded in the accounts or where a false object or beneficiary is deliberately mentioned or whose object or final beneficiary is not precisely specified is prohibited. As a continuation of this rule and except for a particular local situation, previously and expressly validated by the Directorate of Administration and Finance, any payment in cash or by means of similar securities (precious metals or securities or listed securities, etc.) or in kind is also categorically prohibited.

To the extent possible, any person responsible for a payment shall ensure that the payee complies with the laws and regulations to which he/she is subject/subject; the payment methods accepted by WAS S.A.C must in no case seek to circumvent these laws and regulations.

Except in cases expressly validated by the Administration and Finance Directorate in accordance with it, any payment must be made in the country in which the borrower is actually domiciled or in the country in which the service is provided.

e. Money laundering

WAS S.A.C prohibits any conduct aimed at introducing, in its economic and financial structure, resources (money, goods, effects or profits) derived from illicit activities (previous crimes), and whose purpose is to give them an appearance of legality.

f. Terrorist financing

WAS S.A.C prohibits any provision, contribution or collection of funds, financial or economic resources or financial services to commit: (i) terrorist crimes and their aggravating circumstances, acts of collaboration with terrorism, the crime of association with terrorist organizations, the instigation to terrorism, as well as the crime of obstruction of justice. (ii) any of the terrorist acts defined in treaties to which Peru is a party or (iii) the realization of the purposes of a terrorist group or terrorists.

Funds or resources, unlike money laundering, may be of lawful or illicit origin; are prohibited within WAS S.A.C.

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10. ALERTS.

Any manager or worker, as well as external or occasional collaborators of WAS S.A.C who suspect or verify the breach of any of the rules contained in this Code, can send an alert in any of the following ways:

- By hierarchical means to the immediate superior, who in turn will inform the Compliance Officer; or
- Reporting through any of the following channels:

Web page	www.watersolutions.com.pe
Whistleblowing Channel Email	pe.canal-denuncias@watersolutions.com.pe

WAS S.A.C undertakes that the processing of alerts is carried out under the maximum conditions of confidentiality, especially with respect to the content of the alert, the person indicated and the person who reports, including the possibility of remaining anonymous, when necessary.

When anonymity is used, WAS S.A.C undertakes not to take any action in order to identify the author of the alert.

Likewise, WAS S.A.C prohibits any measure, discriminatory or disciplinary, against a person who makes, within the framework of the law, an alert in good faith regardless of the result of the alert or even when the facts reported are inaccurate.

If it is the case that the person sending the alert had some responsibility in the reported facts, WAS S.A.C undertakes to take into account the existence of the alert report, its subsequent collaboration in the treatment of the alert and in the eventual results.

WAS S.A.C may impose disciplinary sanctions and even legal actions under current law, to those persons who abuse the alert procedure by making accusations of bad faith or fail to comply with any of the guidelines indicated in this code of ethics.

Finally, WAS S.A.C undertakes that staff receive advice from an appropriate person regarding what to do if they face a problem or situation that could involve non-compliance with the rules contained in this Code; regarding the procedures for reporting an alert and how to use them; likewise to be aware of their rights and protections in accordance with the procedures.

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11. FORMATS.

- ☐ Annex 1 – Charge of Delivery of the Code of Ethics (led by HR and the evidence thereof must be shared to the PSS-GIS area)

12. CHANGES TO THE PROCEDURE.

REVISION NUMBER	DATE	SUMMARY OF CHANGES / COMMENTS
00	26/09/2022	• Document origin.
01	30/11/2023	• Item 4.2 has been modified.

13. ANNEXES.

- ☐ Not applicable

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ANNUAL AFFIDAVIT

CODE OF ETHICS / CONFLICT OF INTEREST

Yo _____ identified with identity document DNI/CC/CE N° _____ in my capacity as collaborator of WAS S.A.C. in the position of _____ before you I introduce myself and declare:

That, considering that in accordance with the provisions of the Code of Ethics, the Internal Labor Regulations, Anti-Bribery Management System and my employment contract, signed with WAS S.A.C.; any employment relationship must be executed respecting the duties inherent in good faith, I hereby declare that I undertake to carry out my duties in strict compliance with the obligations arising from the principle of good faith at work, that is: respect, protection of confidential information, privacy, correct use of the goods delivered by the employer, obligations regarding Safety and Health at Work, Environment, Quality, Obligations of the Anti-Bribery Management System and; also, avoid conflicts of interest with subsidiaries, third parties, suppliers or customers.

That, I declare to know that my employer is a company specialized in development and execution of projects, which guides its management towards the full satisfaction of its customers; for which it is necessary to have a high sense of responsibility and efficiency on the part of its collaborators. Due to the nature of the service, I must comply with a series of generic behaviors and principles, in addition to the obligations of my position, which constitute the basic guidelines for the provision of my services.

That, in this context, I declare to be aware of the Code of Ethics of WAS S.A.C. and the provisions contained in the Internal Work Regulations of the company; in particular, the prohibition of conduct that evidences conflicts of interest.

That, with respect to conflicts of interest, I declare to know that a conflict of interest arises when my activities and personal relationships interfere or seem to interfere with my ability to act according to the best institutional interests.

That, in order to avoid the configuration of conflicts of interest, I declare that I will record in the attached annex if I maintain professional, commercial or legal relations with customers, suppliers or lessors of WAS S.A.C. or subsidiary companies.

In that sense, **I DECLARE UNDER OATH** that what is expressed is true and in case of any breach and non-observance of my duties and functions as _____; I assume legal responsibility and the consequences that may arise.

[City], _____ de _____ of 20____.

Company

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Fingerprint