

## ETHICS POLICIES, ASSURANCE AND QUALITY CONTROL

In adherence to the different professional pronouncements and professional regulations to which our profession is subject, **Grant Thornton Herrera Guzman y Asociados S. de R.L.**, provides its services in accordance with such regulations included in the following compendiums:

- Code of Ethics issued by IFAC/IESBA (International Federation of Accountants);
- Code of Ethics issued by COHPUCP
- International Statement on Quality Control 1 (ISQC1) issued by IAASB dependent from IFAC/IESBA;
- International Statement on Audit 220 (ISA 220) issued by IAASB;
- Audit Quality Control Manual (AQCM)

The anti-corruption policy is included as part of the ethics and assurance policies of Grant Thornton Herrera Guzman y Asociados S. de R.L. Ethics and assurance policies are mandatory for all professional levels of the firm, who should receive annual updates of the policy. Additionally, as part of the assurance that both, partners and the professional staff have read and understood the policies, it is mandatory that each member of the professional team including partners sign an affidavit when entering to work to the firm, and must renew this statement annually.

## ANTI-CORRUPTION POLICIES

### BRIBES, INADEQUATE FACILITATION PAYMENTS, CHARITABLE AND POLITICAL DONATIONS

The firm, partners and employees must not give or accept a bribe, facilitation payment, or other undue payment for any reason. A facilitation payment is a payment, usually of a nominal value, required to ensure or accelerate the routine action or provision of services to which the person or company is entitled. A rebound is to give or accept money, gifts, or anything of value that is offered in exchange for receiving favorable treatment, including charitable contributions, sponsorships, etc., which are made as a subterfuge for bribery (hereinafter referred to as 'payment').

Bribery is to offer, promise to give, as well as require or accept, any undue advantage, either directly or indirectly, to/or from:

- A public officer
- A political candidate or a political party official.
- Any employee of the private sector (including the person who directs or works for a company in the private sector, including the firm or its affiliates in any capacity).

## POLICY OF THE COMPANY IN RELATION TO BRIBERY

Bribes, gratuities, commissions and other improper payments apply to transactions with customers and potential customers, consultants, contractors, suppliers, government officials and any other entity with which the firm or its partners and employees have dealings, this policy also applies if the payment is made or received directly or through third parties such as an agent, representative, contractor, partner of joint venture or distributor etc.

The firm also expects that its business partners, including joint ventures, agents, distributors, representatives, contractors and suppliers comply with its policy on corruption, bribery, facilitation payments. This may require from us to explain our policy to whom deals with the firm.

In relation with customers, we evaluate the reputational risk of dealing with a client in order to accept a commitment, following the procedures of acceptance of clients established by the firm.

The facts, complaints of bribery accusations of bribery, could cause serious damage to the reputation of the firm. Any person who give or receive bribes, or engage in other acts of corruption, will be subject to disciplinary action that can lead ultimately to dismissal, and where appropriate, be subject to criminal proceedings depending on the severity of the Act. **As a summary, the firm anti-corruption policy prohibits and establishes the following:**

- Not to offer, accept, request or pay bribes or illegal commissions, or facilitation payments.
- Do not use the charitable or political donations as a subterfuge for bribery
- Do not use intermediaries to offer or accept bribes or payments by indirect facilitation.

Any request for an improper payment should be reported to its manager and/or audit partner or immediate boss and to the Managing Partner of the firm, who will submit to analysis the request and through the disciplinary committee will establish the actions to be taken for each case.