



Code of Ethics and Conduct

FENIX POWER S.A

Junio 2024



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1. Letter from the General Manager

Dear colleagues,

As part of the continuous improvement actions practiced by FENIX, I am pleased to present to you the new version of the Code of Ethics and Conduct, which not only reflects the fundamental values of FENIX, recently updated from our head office (COLBUN), but also is built upon the foundation of our purpose.

This new version of our Code of Ethics and Conduct reflects our commitment to valuing people, recognizing the unique value of everyone in our organization. Acting with coherence, being people of our word, and working with passion are the fundamental pillars that should guide our daily actions.

This document invites us to reflect on the fact that every action we take has an impact, positive or negative, on society, the environment, our clients, suppliers, shareholders, ourselves, and our families.

The role that FENIX plays as a company is essential, and we are all called to fulfill our obligations with the utmost responsibility and pride.

I urge you to read this Code of Ethics and Conduct regularly, internalize it, and put it into practice in our daily conduct. In doing so, each of us will embody the company's values, and by acting in alignment with the purpose of contributing positively to our environment, we will continue to make FENIX a key player in the energy development of Peru.

Sincerely,

Juan Miguel Cayo

2. Foundations of the Code of Ethics and Conduct

The foundations of this Code of Ethics and Conduct are based on respect for people and human dignity, both concepts related to the inherent value that all people have simply by existing, which grants them the right to be respected, to deserve recognition for their actions, and to live freely and autonomously without being undermined, discriminated against, or mistreated.

Fenix, as part of Colbun, makes all its decisions in line with the Purpose and Values embedded in its organizational culture.

Purpose: We transform energy, in balance with the planet, to drive your projects and dreams.

Values:

- 1.1. We lead responsibly; we have a role in society.
- 1.2. We want to leave a positive mark.
- 1.3. We care about people; we care about you.
- 1.4. We act with coherence; we are the people of our world.
- 1.5. We have an inclusive purpose.
- 1.6. We work with passion, putting all our energy into it.

When faced with difficult decisions, everyone should ask themselves the following questions:

1. Is it legal?
2. Is it aligned with our Purpose and Values?
3. Does it comply with the Code of Ethics and Conduct and Corporate Policies?
4. Would I be proud of this decision if it appeared in the media?

If the answer to any of these questions is NO, you must refrain from making the decision and discuss the matter with your direct supervisor or use the communication and consultation channels indicated below.

3. Use and scope of the Code of Ethics and Conduct

Who must comply with the Code of Ethics and Conduct?

The Code of Ethics and Conduct applies to all Fenix employees and its directors; legal representatives and employees of its contractors and suppliers; and its external advisors, requiring them to comply with its regulatory principles concerning the tasks they perform on behalf of or in representation of Fenix.

What do these concepts mean for the Code of Ethics and Conduct?

- Fenix, Company or Corporation refers to Fenix Power S.A.
- Employees: includes all workers who perform labor activities for Fenix, whether they work full-time or part-time, and whether their contracts are permanent, seasonal, or for specific projects.
- Third Parties: refers to all individuals, groups, or entities with which Fenix interacts, such as suppliers, contractors, clients, and communities.
- Corporate Policies: refers to all codes, manuals, guidelines, procedures, and any other official documents that regulate how Fenix conducts its business.
- Internal Work Regulations (RIT)¹: this is the document issued by Fenix which, in accordance with applicable labor regulations, establishes, among other things, the sanctions that may be applied to employees who violate their respective employment contracts and/or the behavioral rules set out in these regulations and in this Code of Ethics and Conduct.

How to use the Code of Ethics and Conduct

This Code of Ethics and Conduct provides a set of tools to support Fenix's directors, employees, contractors, suppliers, and advisors in making decisions that impact on the Company and its stakeholders. It also establishes the ethical behavior standards expected from everyone subject to its compliance.

The duty to behave ethically, lawfully, with integrity, and in accordance with Fenix's corporate values is not limited solely to the issues addressed in this Code, as there

¹ RIT: *Reglamento Interno de Trabajo*

are multiple and diverse scenarios in which individuals subject to the compliance of this Code must practice these values and always act within the framework of the law and the Internal Work Regulations (IWR) of the company.

It should be noted that, in the event of a conflict between the rules of the Code and the rules of the IWR, the latter shall prevail. Similarly, in the case of a conflict between this Code and the law, the law shall take precedence.

Furthermore, the Code of Ethics and Conduct includes various communication channels and their respective responsible parties, so that anyone can inquire about ethical matters related to Fenix or report unethical behavior or illegal acts committed by individuals subject to compliance with this Code.

"All individuals subject to the compliance of this Code have the obligation to report any behavior they deem unethical or any illegal acts of which they become aware."

Additionally, the Code of Ethics and Conduct refers to various Corporate Policies to complement and/or elaborate on certain matters. Corporate Policies are available to all individuals required to comply with the Code of Ethics and Conduct; therefore, they must be known, consulted, and adhered to by those individuals.

The points expressed in the preceding paragraphs are explained below for the different stakeholder groups.

4. Employees

4.1 Rights and Responsibilities:

How to behave?

- a. All employees of Fenix must respect the rights of their colleagues and utilize the tools provided by this Code in cases where their safety, their own rights, or those of their colleagues are at risk. In this regard, engaging in workplace harassment or sexual harassment against another Fenix employee or against a worker from a contractor, supplier, client, or advisor is not permitted.
- b. Interactions between employees and others must be respectful; therefore, engaging in violence, mistreatment, or hostile behavior towards others is prohibited. Making threats, deceitful acts, or requests that induce illegal or contrary behaviors to this Code is also not allowed.
- c. The freedom of association, the right to unionize, and the right to collective bargaining must be respected.
- d. Employees must perform their duties loyally and responsibly. Loyalty is expressed through respect for Fenix's values, objectives, policies, and rules, as well as promoting a collaborative work environment and acting honestly and transparently. Responsibility, in turn, involves assuming the consequences of our actions while constantly seeking improvement and adherence to ethical and professional standards.
- e. All forms of modern slavery, such as hiring minors without following the applicable law, subjecting a person to forced labor, participating in human trafficking, or paying manifestly disproportionate remuneration below the legal monthly minimum based on the employee's vulnerability, are abusive behaviors and are prohibited. Additionally, it is necessary to comply with all safety and health requirements at work and keep social contributions up to date.

- f. The consumption of alcohol and drugs during working hours and performing job functions under the influence of such substances is prohibited. Exceptionally, limited alcohol consumption may be permitted at representation activities or any activity authorized by the Organization and People area or, if not applicable, by the person in charge of the respective Central.

Concepts:

- **Sexual Harassment²:** Sexual harassment occurs when an employee—regardless of their hierarchical level—monitors, pursues, harasses, or seeks to establish contact or closeness with a person, without their consent, to carry out acts of a sexual nature.
- **Workplace Hostility³:** This refers to any behavior that constitutes aggression or harassment exerted by the employer or by one or more employees against another or others, by any means, whether manifested once or repeatedly, resulting in detriment, mistreatment, demotion, unjustified transfer, acts of discrimination, humiliation, or threatening or harming the individual's employment situation or opportunities.
- **Violence at Work by Third Parties:** This includes all behaviors that affect employees during the provision of services by clients, suppliers, users, among others.

² Legislative Decree No.1410

³ Supreme Decree No.003-97-TR

4.2 Non discrimination:

How to behave?

Fenix seeks diverse talents, as they are essential for ensuring optimal functioning. Therefore, the selection of new employees and internal promotions must be based on criteria related to individuals' knowledge, experiences, values, and attitudes, as well as promoting inclusion in categories such as gender, disability status, etc. The richness of diversity is provided by inclusion, meaning the ability to manage and integrate individual differences within a team, promoting a diversity of talents, experiences, and identities. Arbitrary discrimination is prohibited and is a behavior subject to sanctions under the Internal Work Regulations, as it can affect the self-esteem and personal freedoms of Fenix employees and does not support the attraction and retention of talent.

Concepts:

Labor Inclusion: This is the process of improving the work environment to promote the full and fair participation of all employees, regardless of their individual differences, to ensure equal opportunities.

4.3 Other activities:

How to behave?

Fenix employees may engage in other labor, economic, academic, political, or volunteer activities outside of Fenix, if these activities are legal, do not compete with Fenix's business, are not conducted during working hours, and do not violate any clauses established in their employment contracts. Additionally, in carrying out these activities, it is prohibited to use Fenix's assets and resources, such as the name and brand of Fenix, company vehicles, facilities, corporate bank cards, equipment, etc.

Furthermore, before starting any of the aforementioned "other activities," employees must inform their direct supervisor, who will notify the Internal Audit

area. Failure to comply with the established internal policies regarding this matter could affect the employees performance, their obligations to Fenix, and may eventually harm the Company's image and reputation.

4.4 Conflicts of Interest

How to behave?

- a. Fenix employees must always act and make decisions prioritizing Fenix's legitimate interests over personal interests or those of related individuals. It is prohibited to take business opportunities that could be utilized by Fenix.
- b. In the decision-making process for hiring employees and selecting suppliers of goods and services, the employee must always follow Fenix's protocols for evaluation and selection.

Additionally, they must inform their direct supervisor and the Internal Audit Management if the candidate for the job position or the potential supplier is one of their related individuals. Therefore, they must refrain from making the hiring decision and allow other Fenix employees without conflicts of interest with that person to make the decision. If the related person of the employee is hired by Fenix, that employee may not supervise that contractual or employment relationship.

- c. Fenix employees must communicate to their direct supervisor and the Organization and People Management any relationship they maintain with another employee, whether it is familial, romantic, a partnership, or another similar relationship, when there is a subordinate relationship, they belong to the same management or are involved in supervision or auditing activities. This is important because such situations can cause a conflict of interest, affect impartiality in the workplace, and harm the company's work environment.
- d. All employees must complete and/or update the annual declaration of interests and related individuals, in which they must also declare any kinship

or relationship they have with public officials, government authorities, or politically exposed persons (known as PEP).

Employees are obligated to update the Conflict-of-Interest Declaration at any time during the year, depending on the emergence of potential conflict of interest situations.

e. Receiving and giving gifts and invitations:

e.1 As a general rule, employees, including directors and executives of Fenix, may not accept corporate gifts, except those that meet the following conditions:

- Do not exceed USD 100.
- Do not compromise their integrity, judgment, or imply, or even appear to imply, that their acceptance could influence the decisions that the Fenix employee must make regarding that third party or their related individuals.
- If it is believed that the above two conditions are not met, this must be reported to the Internal Audit Management, which, based on reasonable criteria, will determine whether such gifts can be accepted.

e.2 Furthermore, giving gifts, benefits, and invitations from employees, including directors and executives of Fenix, to third parties is prohibited. In case there is any exception, it must be approved by the General Manager and should never be offered if it appears to be intended to influence the decisions of third parties such as bidders, suppliers, clients, competitors, trade associations, communities, etc.

e.3 Similarly, Fenix prohibits "without exception" the giving of gifts or any form of hospitality to public officials. This is to avoid any conduct that could be considered an attempt to obtain any type of benefit from the public official.

e.4 If an employee receives an invitation to participate in any training, conference, or seminar, they must inform their immediate supervisor to determine the co-financing of that activity, in which Fenix must at least cover the travel or accommodation expenses (as applicable).

Concepts:

- **Related Individuals:** These include family members (spouse, parents, children, grandparents, grandchildren, siblings, uncles, nieces, nephews, brothers-in-law, parents-in-law, and daughters-in-law), partners, close friends, and the companies in which the Fenix employee holds directly or indirectly 5% or more of the capital of that company, or companies where the employee or their family members are directors or managers or hold 5% or more of the capital of that company or exert effective control over decision-making.
- **Public Official:** Anyone who, by law, by election, or by appointment by the competent authority, participates in the exercise of public functions, whether for remuneration or honorarium. The term also includes officials or employees of state-controlled or state-owned companies, whether domestic or foreign.
- **PEP:** Politically Exposed Persons are those Peruvians or foreigners who perform or have performed prominent public functions in a country, up to at least one year after the end of these functions.

4.5 Use of Information:

How to Behave?

- a. Every employee, especially the leaders in each area at Fenix, must keep strictly confidential any information about the Company that has not been publicly shared. Therefore, they should not make recommendations to others regarding the purchase or sale of Fenix shares, nor use such information for personal gain or to the benefit of others or to avoid losses, particularly before Fenix's financial statements are published to the market and during negotiation stages of mergers and acquisitions.
- b. Fenix adheres to Law 29733 and its amendments and regulations, the Personal Data Protection Law, and the data protection guidelines in the Penal Code. The use of insider information is a crime punishable by law with imprisonment penalties.

- c. Information represents one of Fenix's most important assets. Any unauthorized disclosure to third parties of confidential or relevant business information, or disclosures made through channels other than those expressly authorized, could be detrimental to the company and to the trust relationships established with various stakeholders. In any case, such information cannot be revealed until it has been communicated to the market through established channels.
- d. Responsible leadership implies safeguarding documents containing insider information, trade secrets of Fenix, and information about its employees, former employees, customers, and suppliers. Therefore, this information should only be shared with those who have the necessary authority and in secure environments where it cannot be leaked. Sensitive information from Fenix that needs to be provided to relevant counterparts or regulators should be exclusively delivered by authorized employees and using the established official channels.

4.6 Cybersecurity and Personal Data:

How to behave?

All employees at Fenix must exercise special care in using new technologies and communication methods in accordance with the Information Security and Cybersecurity Policy, adhering to the following directives:

- a. **Data Usage:** Information regarding Fenix, its businesses, suppliers, clients, and the personal data of its employees and suppliers must be obtained, recorded, processed, and used solely for company purposes while respecting employee privacy and applicable regulations.
- b. **Data Handling:** The acquisition, registration, processing, and deletion of information related to Fenix, its employees, suppliers, and clients must comply with internal policies.
- c. **Access Protocol:** Access to Fenix's intranet and corporate email accounts must occur via networks and devices authorized by the company.

- d. **Credential Security:** Each employee must use their assigned physical or digital credentials (username and password) personally and cannot share them with other employees or external parties.
- e. **Software Restrictions:** Installing software or modifying device configurations without prior authorization from the IT Department is prohibited. Data backup must only occur on systems and tools approved by this department. Employees are responsible for promptly reporting any security breaches regarding information or personal data to the IT Department.
- f. **AI Usage:** Fenix promotes responsible and ethical use of Artificial Intelligence (AI). The development and implementation of such technologies must comply with current legal standards, focusing on the benefit of stakeholders while respecting their rights and privacy. Additionally, a culture of transparency and responsibility should be encouraged within the organization, fostering the development and adoption of AI technologies aligned with Fenix's values and purpose.

4.7 Use and Care of Company Assets:

How to Behave?

Regarding the tangible and intangible assets of the company, their care is the responsibility of the employee assigned to or in control of them; therefore, they must protect them from possible damage, misuse, loss, theft, and robbery.

- a. The use of tangible and intangible assets (cell phones, computers, corporate image, among others) must be for the benefit of fulfilling each employee's functions at Fenix, respecting current laws and internal regulations for this purpose.

- b. Vehicles, offices and facilities, corporate emails, corporate credit cards, among others, are resources of Fenix and must be used by employees exclusively for company purposes.
- c. Corporate credit cards may only be used to pay necessary expenses related to the exercise of their functions in accordance with internal policies; it is strictly prohibited to make payments for personal expenses.
- d. When traveling for work, Fenix employees represent the company and, therefore, must behave appropriately according to the circumstances. Expenses should be moderate and correspond to the items previously authorized by the company. Personal expenses are prohibited.
- e. Expenses and reimbursements for alcoholic beverages are prohibited, except when they correspond to representation expenses or as part of an activity authorized by the Head of Organization and People or, failing that, by the person in charge of the Central.
- f. The intangible assets of Fenix, such as its information, intellectual property, reputation, and brand, should only be used by Fenix employees who are authorized for this purpose and for the relevant objectives in each case. They should also take special care in using new technologies. Any software or application used must be previously authorized by the Information Technology department.
- g. Regarding the intellectual and industrial property of third parties or other external individuals or entities, employees must refrain from incorporating, reproducing, or using any elements protected by copyright or other forms of intellectual property without authorization.

- h. Social media must be used responsibly, meaning avoiding the publication of confidential company information and expressing opinions that could affect its image and reputation.
- i. Accessing links, information, or external applications through company equipment requires verification of their origin. If there are doubts or suspicions about the intended purpose of the mentioned links, access should be denied or consulted with the specific support available for these purposes.
- j. Additionally, the use of the “Fenix” and “Colbun” brands, logos, appearances in media, social media, and other public or private spaces, such as seminars and conferences, on behalf of Fenix or Colbun or using the brand(s), must be previously authorized by the Corporate Affairs Management.
- k. Upon termination of the employment relationship, all tangible and intangible assets of Fenix must be returned, and no copies of Fenix’s information, its employees, clients, or suppliers can remain in the possession of the former employee. Exceptionally, they may acquire an asset in accordance with the guidelines defined regarding this matter within the Company.

4.8 Corruption and bribery:

How to behave?

- a. Employees of Fenix may not offer bribes, loans, gifts, meals, trips, benefits, favors, preferential treatment, or others to national or foreign public officials.

- b. Donations for political purposes are prohibited. Donations for social, charitable, or scientific purposes must comply with Corporate Policies to be authorized.
- c. Fenix employees who hold meetings with government, municipal, or legislative authorities must inform the Crime Prevention Systems Area, according to the established guidelines for this purpose. These meetings should always be conducted with complete transparency regarding the subject matter to be discussed, prioritizing the regulations adopted; efforts should be made to hold these meetings at Fenix facilities or in the offices of the Public Institution to which the officials belong, following the parameters established in Law N° 28024, which regulates interest management in public administration.
- d. The relationship, interaction, and communication with public entities and their officials must be carried out by authorized representatives of Fenix designated to deal with each specific entity and according to the relevant matters.
- e. Fenix employees must assist in providing information required by regulatory entities and facilitate investigative proceedings ordered by the judiciary, especially in cases where the criminal responsibility of Fenix and/or its employees may be investigated.

4.9 Quality of Work Life

The success of our management depends on professionals who possess integrity, the necessary competencies, and demonstrate enthusiasm in the tasks they perform. To achieve this, we consider it a priority to achieve the greatest balance between family life and work, which is why we strive to implement practices that strengthen the relationship between family and work in a harmonious and effective manner.

Likewise, we promote professional development, continuous training, and a work environment that also contributes to the quality of life of our collaborators.

4.10 Environment and Sustainability:

How to behave?

Fenix employees must comply with current environmental legislation; therefore, they are responsible for preventing adverse impacts on the soil, subsoil, flora and fauna, as well as on the water bodies existing in the areas associated with the provision of services. This involves preventing the contamination of these areas through practices that minimize the release of toxic substances, such as industrial chemicals or hazardous waste that could cause harm. Additionally, they must ensure the proper handling and disposal of waste or contaminating substances in accordance with current regulations.

5. Contractors, Suppliers, and Advisors

A contractor or supplier shall be understood as any natural or legal person that provides goods or services to Fenix, and, temporarily, natural or legal person acting on behalf of any contractor or supplier.

The internal regulations included in this Code shall be an integral part of any agreement that Fenix enters with its contractors and suppliers; the violation of any of the minimum requirements contained herein may result in disqualification from providing goods and/or services to Fenix.

5.1 Fair Treatment:

How to behave?

- a. In evaluating the hiring of suppliers and contractors, especially in the case of tenders, Corporate Policies must be followed, ensuring fair and transparent treatment, striving to select the best option for the interests and objectives of Fenix, while respecting the law and the ethical framework established in this Code.

- b. During the tender processes, it is expected that bidders comply with the rules established in the tender and maintain confidentiality regarding any information that could harm the process and/or their competitors.

Additionally, they are expected to avoid any conduct aimed at improperly influencing Fenix's decision or obtaining undue benefits or preferences. Fenix's suppliers and contractors must refrain from offering gifts or other benefits that could influence the decision-making of Fenix's employees.

- c. Bidders for goods and services, as well as current suppliers and contractors of Fenix, must timely report about any conflict of interest, even if it has not yet materialized, especially when it concerns related persons to Fenix's employees.
- d. Bidders for goods and services during the tender processes must comply with the formats requested by Fenix's Crime Prevention System Area when applicable; these formats are considered sworn statements.

5.2 Third-Party Workers:

How to Behave?

- a. Fenix's contractors and service providers must request prior authorization to subcontract all or part of the services they provide to Fenix, unless the contract signed between the parties allows for such a modality. The providers of subcontracted services must meet the same conditions, quality of service, and standards of conduct originally agreed upon with Fenix.
- b. They must also comply with the Corporate Policies regarding people, human rights, and working conditions; safety and health; environment and communities; business integrity and compliance. These elements are an

integral part of the agreements that Fenix has with its contractors and suppliers.

- c. Contractors and suppliers must inform their workers promptly and comprehensively about the risks involved in their work, the required preventive measures, and safe working methods. They must also provide working conditions that foster healthy, safe, and comfortable environments to prevent accidents and injuries.
- d. Contractors and suppliers must report to Fenix any situation, condition, or event that may cause accidents.
- e. It must be clear that all forms of slavery and forced labor are abusive practices that are not allowed. Any form of child labor that does not strictly adhere to applicable law is prohibited.
- f. Any conduct of harassment or discrimination based on race, gender, age, disability, marital status, association, religion, political opinion, nationality, ethnic origin, sexual orientation, or social background is strictly prohibited.
- g. It is mandatory for Fenix contractors and suppliers to comply with all occupational health and safety requirements and to keep up with the payment of social security and healthcare contributions for their workers. In this regard, they must comply with all labor law requirements, especially concerning the remuneration of their workers, including the payment of overtime and other benefits. Additionally, it will be encouraged and promoted – depending on the circumstances – that wages and other benefits exceed the legal minimums.
- h. Contractors and suppliers must respect workers legal rights, their freedom of association, and their right to collective bargaining.
- i. The actions carried out by service providers, whether directly or indirectly contracted, on behalf of Fenix when dealing with third parties, especially national or foreign public officials, must be lawful and appear to be lawful, strictly adhering to the applicable law. All forms of corruption, bribery, or money laundering are prohibited.

- j. Contractors and suppliers must respect and promote compliance with fair competition regulations.

5.3 Procurement:

How to behave?

- a. The goods that contractors and suppliers provide to Fenix must have a lawful origin and include all the licenses, permits, and rights necessary to guarantee Fenix's free and proper use of these goods.
- b. Fenix's facilities and furniture, its computer systems and electronic devices, trade secrets, intellectual property, and confidential business information, as well as data about its customers, suppliers, and employees; rights and licenses of all kinds; and any other physical or intangible assets must be protected, safeguarded, and respected by its contractors and suppliers. These must not be shared or delivered to anyone who does not have Fenix's express authorization to use or handle such assets.
- c. The name of Fenix and its brand may be used by third parties only if they have prior, express, and written authorization from Fenix's authorized representatives.
- d. Contractors and suppliers must protect the image and reputation of Fenix by refraining from any actions that go against the corporate values and ethical standards set forth in this Code.
- e. Additionally, Fenix promotes commercial relationships with companies that provide products or services linked to the communities surrounding our operations, when the conditions exist for the goods and services involved to be supplied in a competitive and sustainable manner.

5.4 Environment and Communities in Contractors and Suppliers:

How to behave?

- a. Contractors and suppliers must comply with current environmental legislation, and therefore, they cannot cause unauthorized impacts on the flora, fauna, soil, subsoil, waters, or any other environmental component present in areas associated with the provision of services.
- b. They may not introduce or cause the introduction of biological, physical, or chemical agents into the sea, rivers, lakes, or any other body of water that could harm those bodies of water or the hydrobiological components found there.
- c. They must refrain from producing pollutants or noise and from disposing of waste in any way that differs from what is established by current regulations.
- d. Additionally, they must identify substances, chemical products, or objects that may harm the environment and ensure they are handled, transported, stored, recycled, and ultimately disposed of safely.
- e. Similarly, they must respect the culture and surroundings of the communities in which we operate, keep them informed, and minimize the social impact of our activities.
- f. It is expected that they will measure and manage the impact of their operations, promoting products and services with a lower carbon footprint.

6 Clients

How to Behave?

- a. Our relationships with customers must be transparent and responsible, always striving to meet commitments and comply with applicable laws. We are committed to providing excellent service and being efficient and proactive in addressing our customers' needs, including resolving

operational and administrative issues. The individuals responsible for direct customer relations are accountable for providing an appropriate, proactive, and continuously improving response.

- b. When Fenix participates in public or private bidding processes as a bidder, its representatives must adhere to the rules established for the respective bidding process, performing their duties honestly and reporting any unethical practices they observe.
- c. Fenix's customers may always request information regarding the compliance status of the services provided and their billing processes, as well as communicate directly with Fenix representatives.

7 Investors and shareholders

How to Behave?

- a. Fenix must treat its investors fairly, without discrimination, and in accordance with the law, avoiding favoritism toward any over others, particularly regarding the provision of information about the company and its business. Exceptions are only allowed as provided by law and applicable regulations. Otherwise, this could negatively impact the company's image and reputation and potentially constitute a criminal offense.
- b. Information to investors must be provided promptly through authorized channels and spokespersons, especially when the information is classified as essential or of interest according to applicable laws and regulations.
- c. The financial and non-financial information reported by Fenix must be based on reliable, accurate, and trustworthy records, validated by those responsible for generating such information.

8 Community and Society:

8.1 Free Competition:

How to Behave?

- a. Fenix is not permitted to engage in collusive practices or agreements with competitors, such as agreeing to alter or fix the prices of goods and services, assign market areas or quotas, or limit production.
- b. Free competition must always be safeguarded, and therefore, it is not allowed to share Fenix's confidential information, accept competitors' confidential commercial information, or misuse such information in any context, including in circumstances of participation and collaboration through trade associations, reorganization processes, mergers and acquisitions, or other cooperative agreements with competitors. Relationships with Fenix's competitors must be conducted in good faith, in strict compliance with the law, and in accordance with Corporate Policies and Manuals on free competition.
- c. The use of registered brand identities (jingles, slogans, color combinations, etc.) by other organizations without proper authorization is not permitted.

8.2 Community Engagement:

How to Behave?

- a. All relationships and social management aimed at developing Fenix's business sustainably must comply with applicable law and Corporate Policies. Mismanaging community relations can jeopardize the social license or approval that Fenix needs to sustainably develop its business.
- b. Initiatives and projects carried out in communities must contribute to local development, and their management should protect Fenix's image and reputation, promoting transparent and collaborative dialogue.

Concepts:

- **Community:** Refers to all members within the area of influence of Fenix's plant and projects, including local authorities.
- **Society:** Refers to opinion leaders at the local, regional, or national level, media outlets, trade and collaborative associations, as well as universities and other institutions connected to Fenix's business.

8.3 Crisis Management:

How to Behave?

- a. The area manager or department head where an unforeseen problem occurs, involving the health or safety of people, damaging the environment, or potentially affecting Fenix's image and reputation, must take all reasonable measures to contain the negative effects of the crisis and safeguard people's safety as soon as they become aware of the issue.
- b. Simultaneously, they must inform their direct superior and the Corporate Affairs Management about the incident, providing a basic assessment of the causes and effects observed, including a detailed account of the events and identifying those affected.
- c. Only Fenix's authorized spokespersons are allowed to speak with the media and inform those affected about the incident, and they must act in accordance with Corporate Policies.

9 Environment and Sostenibility

How to behave?

- a. Sustainability is an integral part of Fenix's business decisions. Therefore, applicable laws must always be followed, and management systems should be used in accordance with Corporate Policies.

- b. In the development of projects and facilities, efforts must be made to achieve harmonious integration with the environment, minimizing the environmental impact
- c. The unauthorized use of technologies, inventions, or procedures patented or registered by other individuals or entities is not permitted.
- d. Environmental permit management must be conducted by Fenix's authorized representatives, strictly complying with the law, respecting deadlines set by applicable regulations, and avoiding any actions that could be seen as illegal or unethical.

10 Sanctions

Failure to comply with the Code of Ethics and Conduct and/or Corporate Policies can seriously endanger or harm the health, safety, and integrity of individuals, and negatively impact Fenix's various stakeholders.

In general terms, any unethical behavior by Fenix employees that violates the provisions of this Code may result in the sanctions outlined in the Internal Work Regulations. These sanctions can range from a verbal warning to the termination of the offending employee.

Illegal acts deemed as crimes by law are punishable under criminal law. The perpetrator or executor of the crime, as well as individuals who may be involved, may face criminal penalties, including fines, imprisonment, forfeiture of ill-gotten gains, and disqualification from holding certain professional positions.

For Fenix, sanctions may include fines, restitution of gains, reparations, disqualification from contracting with government entities, suspensions, and even dissolution of the company.

Non-compliance by contractors and suppliers with the ethical and integrity standards set forth in this Code may result in the sanctions stipulated in the contracts and/or agreements between the parties, as well as other penalties

allowed by applicable law, which could even lead to the termination of the contractual relationship.

Regarding Fenix's advisors, it is important to note that any illegal actions they undertake while representing Fenix could lead to administrative and/or criminal liability for the company.

Additionally, unethical or illegal actions committed by any individual subject to this Code may severely damage the Company's image and reputation, erode the trust of clients, suppliers, regulators, and investors, and result in financial and economic losses.

11 Communication, Inquiries, and Reporting

At Fenix, we consider it essential to maintain open and fluid communication among employees, using the channels the Company has established. We encourage all individuals within the Company to express their opinions effectively, enabling dialogue that fosters continuous improvement and supports transparent, informed decision-making. To facilitate this, Fenix provides specific communication channels for inquiries related to this Code, as well as other corporate rules and policies.

In addition, Fenix has a Whistleblower Channel designed to offer a secure and confidential tool for any person or stakeholder (employee, shareholders, customers, suppliers, and/or communities) to report any matter related to the Company that may be considered a breach or violation of the provisions set forth in this Code of Ethics and Conduct, the Crime Prevention Model (associated with the Administrative Liability Law for Legal Entities – Law 30424°, including amendments and regulations), Internal Policies, and/or the laws governing the company. It can also be used to report any behavior that infringes on Human Rights or is contrary to the Company's purpose and values.

This channel allows for the submission of complaints, and in all cases, the Company ensures an independent, confidential review with no retaliation, as well as an appropriate response and resolution of the reported issue.

The matters described above can be reported through the following means:

- a) **Fenix website:** <https://www.fenix.com.pe>
- b) **Email :** lineaetica@fenix.com.pe
- c) **Letter** addressed to the Head of Internal Audit, at Av. Antonio Miro Quesada No. 425. Lima, Magdalena. Perú.