

# CODE OF ETHICS AND CONDUCT FOR SUPPLIERS AND CUSTOMERS

We choose to be better



PESQUERA

DIAMANTE



# **CODE OF ETHICS AND CONDUCT FOR SUPPLIERS AND CUSTOMERS**

We choose to be better

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# BOARD PRESIDENT'S MESSAGE

At Pesquera Diamante, we have been leading the Peruvian fishing industry for more than three decades, and this sustained presence has not only contributed to the economic development of the country and the well-being of our stakeholders, but has also allowed us to set an ethical, responsible and in line with our Diamante values: Excellence, Respect, Integrity and Lifelong Learning.

The Diamante culture has been strengthening over the years and, today, we have essential tools to instill it in each of our collaborators, who incorporate our ethics and our correct way of doing things. This commitment to Diamante ethics and good conduct is non-negotiable and, as expected, we expect each of our suppliers, customers and related third parties to endorse this commitment.

The Code of Ethics and Conduct for Suppliers and Customers is a framework of how the company expects all suppliers, customers and related third parties to perform during their relationship with Pesquera Diamante, in each of their activities with our company.

Therefore, I make a cordial call to strictly comply with the guidelines and standards explained in this Code, and to promote and disseminate it inside and outside Pesquera Diamante, as it is a guide to good practice that deserves to be replicated.

Fernando Ribaudo  
Board President

# GENERAL MANAGER'S MESSAGE

Pesquera Diamante is a company that develops its activities under a seal of identity fully aligned with ethics and good conduct, in each of the different processes and stages that allow us to promote and lead the Peruvian fishing industry. This is a commitment shared by all Diamante members and which translates into the correct way of acting and making decisions, for the personal good and the good of the company and the development of our beloved country.

In that sense, we already have an internal Code of Ethics and Conduct and, now, we have decided to extend it to all our suppliers, customers and related third parties, through the text that we deliver to you today. The Code of Ethics and Conduct for suppliers and costumers is a compilation of concepts, principles and guidelines that guide daily actions, help make better decisions and resolve conflicts that may arise during the employment relationship with Pesquera Diamante.

What we seek is to instill our Diamante ethics, values and purposes and thus be clear about where we are heading and what is the optimal way to achieve it. I invite you to read this Code, to assume the important commitment to compliance detailed here, to adhere to its standards and ideals, and to always have it at hand as a valuable resource to resort to whenever necessary.

Pablo Trapunsky  
General Manager

# RISK AND COMPLIANCE OFFICER'S MESSAGE

The Pesquera Diamante company has carried out a transformation of all its processes to further strengthen our capabilities and potential. This significant commitment seeks excellence in terms of compliance, based on the ethics and values that distinguish us.

This is why we make available this Code of Ethics and Conduct for suppliers and customers, which is aligned with the Diamante Compliance Program and ensures that the relationships between collaborators, with our customers, with our suppliers, with our society and with our environment reflect ethical conduct based on excellence, respect, integrity and lifelong learning.

In the event of unethical incidents during the development of any work with Pesquera Diamante, one must be clear about what to do and what to decide and, thus, show zero tolerance for corruption, illegality and unethical behavior. At Pesquera Diamante, we take a firm position in this regard and it is imperative that all our suppliers, customers and related third parties assume this essential commitment.

As a Diamante Risk and Compliance Officer, I am available to each of you in person and/or through our Integrity Channel, whenever you have any questions or feel committed to reporting any opportunity for improvement regarding our ethical conduct. Let us feel confident in collaborating with a transparent, ethical and responsible organization.

Renzo Zea  
Risk and Compliance Officer

# How to make the right decision?

In any doubtful situation regarding conduct and ethics in the performance of your activities with Pesquera Diamante, you should ask yourself:

Does this conduct imply a violation of the Code of Ethics and Conduct for Suppliers and Customers of Pesquera Diamante, its policies or the laws?

Does this behavior not go hand in hand with the culture or Diamante values?

Can this behavior be seen as unethical by others, inside and outside of Pesquera Diamante?

Could this conduct damage my reputation or the reputation of Pesquera Diamante?

If the answer is

**“YES”**

to any of these questions, you should ask for help.

By asking and reporting our concerns, we are doing the right thing and helping to stop or prevent misconduct or wrongdoing.

# About the Code of Ethics and Conduct for suppliers and customers

The Code of Ethics and Conduct for Suppliers and Customers is a guide to good practices and guidance for good conduct. It is based on ethics and integrity, pillars that are part of the Diamante culture. Its objective is to make known the guidelines and steps to follow in the various situations that may arise during the relationship and collaboration with PESQUERA DIAMANTE.

## Who does the Code apply to?

- Company Suppliers
- Company Customers
- Related third parties that interact directly or indirectly with the Company

## Responsibilities

The responsibility and strict compliance with this CODE, without exceptions, is mandatory for all suppliers, customers and third parties related to PESQUERA DIAMANTE

Each employee of PESQUERA DIAMANTE makes the Diamante culture their own. Therefore, in accordance with its functions, when interacting with any supplier, customer and third party related to the Company, it has the obligation to supervise compliance with the CODE and not allow violation of the standards, practices and ethical behaviors established in this.

The Risk and Compliance Management of PESQUERA DIAMANTE is responsible for reviewing, updating and disseminating the CODE, in coordination with the management responsible for the processes that interact directly with suppliers, customers or third parties related to the Company.



THE CODE OF ETHICS AND CONDUCT IS FOR EVERYONE.

THE CODE OF ETHICS AND CONDUCT IS ALIGNED WITH THE DIAMANTE CULTURE.



## About Pesquera Diamante

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PESQUERA DIAMANTE is a leading company in the production of fishmeal, fish oil, canned food, fresh and frozen products. We have a successful and impeccable track record in the fishing sector, and our main objective is to satisfy the food needs of the Peruvian and global market.

## 2. About Pesquera Diamante

### Our values



Diamante values reflect who we are and what we are capable of achieving.



#### Excellence

We are committed to the objectives and implement them with simplicity, speed, quality and security. We question ourselves to propose actions that allow us to achieve outstanding results.



#### Respect

We value and recognize the rights and dignity of people both inside and outside the company, having an open attitude to diversity.



#### Integrity

We act honestly, ethically, consistently and impartially; In this way we will generate a climate of trust in our environment.



#### Lifelong learning

We have the humility to listen and learn from everyone, working as a team, recognizing that we have opportunities for improvement and that we move in a changing environment, thus we will achieve business goals.

## 2. About Pesquera Diamante

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### Our Mission and Vision

#### Mission

Contribute significantly to feeding the world through healthy, high-quality products, based on a sustainable and efficient management model, driven by the talent and creativity of our people.

#### Vision

Provide the world with the best nutrition through hydrobiological ingredients and products.

## 2. About Pesquera Diamante

### Our Corporate Governance



DIAMANTE GOOD  
CORPORATE GOVERNANCE  
GENERATES VALUE AND  
TRUST WITH OUR  
STAKEHOLDERS.

#### Good Corporate Governance

At PESQUERA DIAMANTE, we incorporate the best practices in ESG (Environment, Social and Governance) to contribute to the reputation and integrity of the Company and generate value and trust with our stakeholders.

Our management system, guidelines, administration and internal control allow us to promote ethical transparency in the governance and direction of the Company. To do this, we share the vision, mission, values and corporate policies, so that all collaborators, customers, suppliers and other interest groups know the guidelines of conduct, policies and government practices that must be followed for management and administration of the company.

#### **IMPORTANT:**

You can find more information about the Diamante Corporate Governance Model at  
<https://www.diamante.com.pe/gobierno-corporativo>

## 2. About Pesquera Diamante

### Our Corporate Governance

#### **Commitment to ethics, conduct and compliance**

At PESQUERA DIAMANTE, ethics, integrity, conduct and compliance are inseparable from our corporate values and are part of the Diamante Compliance Program. But ethical behavior goes beyond compliance with the laws: all Diamante collaborators have the responsibility to comply with the laws and reflect it in our conduct when carrying out our duties. This commitment is transferred to our suppliers, customers and other interest groups, with whom we interact according to applicable legislation, internal regulations and our corporate values.

Our suppliers, customers and related third parties are committed to ethics, conduct and compliance to:

1. Act with honesty, transparency and loyalty in all processes in which they interact with PESQUERA DIAMANTE.
2. Fulfill the commitment to the Company's corporate social responsibility.
3. Respect people, values, society and the environment.
4. Comply with the laws and regulations that regulate the Company's activity and with the applicable internal regulatory documentation.



ETHICAL BEHAVIOR GOES  
BEYOND COMPLIANCE WITH  
LAWS.



## Mutual Responsibilities

### Ethics and integrity

At PESQUERA DIAMANTE, we carry out our business activities with ethical, upright conduct and with values recognized by our collaborators and third parties.

Reputation is an asset that the Company considers highly value and seeks to preserve it, so it cannot be exposed to benefits from transactions or businesses obtained through improper means. Our suppliers, customers and related third parties must comply with applicable laws in accordance with the sector and the Company's internal regulations, as well as take into account the following commitments in the execution of their activities.

### 3. Mutual responsibilities

## Ethics and integrity

### **Corruption, bribery, money laundering and terrorist financing**

We always act with integrity in accordance with the provisions of Law 30424 "Law that regulates the administrative responsibility of the legal persons for the crime of transnational active bribery". For PESQUERA DIAMANTE, corruption and bribery are unacceptable, therefore, we prevent our operations from being involved with illicit activities such as money laundering and financing of terrorism in all its forms, directly or through third parties.

In this sense, at PESQUERA DIAMANTE, we do not allow or authorize our suppliers, customers and related third parties:

- Promise, make, request or receive payments outside the law or bribes in interaction with private or public entities, people, public or government authorities to secure any contract, approval or advantages for your own benefit or that of the Company.
- Provide inaccurate, fraudulent or inappropriate information to state and regulatory agencies.
- Disregard the authority of regulatory entities or public officials in any place where they conduct their business or maintain dishonest or unethical relationships with them.

In addition, we design the necessary preventive and detection controls in our processes, to avoid committing these crimes and to be diligent in interacting with our other stakeholders.

### 3. Mutual responsibilities

## Ethics and integrity



REPUTATION IS AN ASSET OF HIGH VALUE FOR DIAMANTE, SO IT CANNOT BE EXPOSED TO PROFITS FROM TRANSACTIONS OR BUSINESS OBTAINED BY IMPROPER MEANS.

### Anti-competitive conduct

The best markets are properly developed within an ethical framework, where you can compete fairly, loyally, honestly and appropriately. In this sense, in accordance with Legislative Decree 1034 that approves the "Law for the Repression of Anti-Competitive and Modifying Conduct", PESQUERA DIAMANTE prohibits its collaborators and reinforces the commitment that its suppliers and customers have to avoid:

- Agreements
- Plans

Whether express or tacit, formal or informal, written or oral, with competitors or other third parties (distributors, suppliers) related to:

- Sale or purchase prices
- Terms or conditions of a sale or service
- Distribution
- Zone or market assignment
- Exclusion of competitors or affecting the outcome of bidding processes or limiting free competition in the markets in which the Company operates

### IMPORTANT:

You can find more information by consulting the Policy for the Prevention of Corruption, Money Laundering and Financing of Terrorism and the Free Competition Policy, published at <https://www.diamante.com.pe/gobierno-corporativo>

### 3. Mutual responsibilities

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#### Ethics and integrity

##### **Security, privacy and confidentiality of information**

Our suppliers, customers and related third parties must, at all times, take the necessary measures to properly protect, collect and handle confidential and personal information, including physical and electronic assets obtained from PESQUERA DIAMANTE. This information will be used strictly for the purpose for which it was provided.

Thus, our suppliers, customers and related third parties undertake to immediately inform the Company in the event of any incident that involves:

- Unauthorized access
- Disclosure or (potential) loss of such information, including, but not limited to, theft, damage, destruction, attempted cyber attack, ransom, etc.

### 3. Mutual responsibilities

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## Ethics and integrity

#### Security, privacy and confidentiality of information

##### a. About the use of privileged information

Our suppliers, customers and related third parties must not carry out operations, transactions or speculation with non-public and confidential privileged information obtained from their relationships with PESQUERA DIAMANTE.

##### b. About secrecy, confidentiality and protection of information

Our suppliers, customers and related third parties must not disclose confidential and strategic information or use it for their benefit or the benefit of third parties.

All our suppliers, customers and related third parties declare that they know that the information that PESQUERA DIAMANTE provides them is confidential and privileged, so its use is not permitted without the prior express authorization of the Company.

Furthermore, our suppliers, customers or related third parties cannot use the logo or any identity element of PESQUERA DIAMANTE, unless expressly authorized.



### 3. Mutual responsibilities

## Ethics and integrity

#### Security, privacy and confidentiality of information

##### c. About the Company's resources

The Company's resources include property, assets, intellectual property and confidential information. We hope that our suppliers, customers and related third parties:

- Safeguard the Company's resources that are used in the course of the work they are doing.
- Respect the intellectual property rights of PESQUERA DIAMANTE.
- Maintain, manage and, where applicable, process any confidential information internally and on a utility basis only, with the utmost care and in accordance with applicable law.

##### d. About information security

Our suppliers and related third parties guarantee at all times that the product delivered or the service provided complies with the information security standards, applicable rules and regulations, as well as any aspect established directly in the contract with the Company.

Our suppliers and related third parties guarantee the implementation of the necessary information security measures to ensure that the digital information contained in their systems and documentary-type information have adequate protection based on their level of confidentiality.

### 3. Mutual responsibilities

## Ethics and integrity



WE ARE ALL RESPONSIBLE  
FOR THE PROTECTION,  
COLLECTION AND PROPER  
HANDLING PESQUERA  
DIAMANTE INFORMATION.

#### Security, privacy and confidentiality of information

##### e. About the protection of personal data

Our suppliers, customers and related third parties undertake to comply with the applicable legislation regarding data protection and applicable privacy and to carry out data processing within the framework of the contractual relationship with PESQUERA DIAMANTE.

Our suppliers, customers and related third parties do not disclose, transfer or share confidential information or personal data information in their possession.

#### IMPORTANT:

You can find more information by consulting the Personal Data Protection Policy, published in <https://www.diamante.com.pe/gobierno-corporativo>

### 3. Mutual responsibilities

## Ethics and integrity



AT PESQUERA DIAMANTE, WE  
CREATE A PRODUCTIVE AND  
SAFE ENVIRONMENT FOR  
EVERYONE, WHERE RESPECT  
IS THE PRIMARY VALUE AND  
THE PROTECTION OF HUMAN  
RIGHTS IS ASSURED.

### Respect for people

All our suppliers, customers and related third parties must generate a productive and safe environment for their collaborators, customers, suppliers, community and other interest groups, where respect is the most important value, through internal strategies aligned with the protection of the human rights and the value of respect. Therefore, they are committed to:

1. **Eradication of child labor:** not tolerate child labor, direct or indirect, throughout all internal processes, so that the labor standards of the International Labor Organization (ILO) and the principles of the United Nations Global Compact are complied with.
2. **Promote the choice of free employment:** not accept any act that encourages forced labor, that is, that which is carried out involuntarily or under threat, nor human trafficking throughout the value chain.

### 3. Mutual responsibilities

## Ethics and integrity

### Respect for people

**3. Diversity and inclusion:** When hiring, remunerating, training, promoting, dismissing or retiring personnel, equal treatment of all employees must be ensured through internal strategies to eliminate all types of discrimination based on:

- Race or nationality
- Age
- Religion
- Civil status
- Pregnancy
- Physical attributes
- Disability
- Sex or sexual orientation
- Gender identity or gender expression
- Participation in unions or political affiliation
- any other illegitimate criterion according to current legislation

### 4. Fair and dignified treatment

Not tolerate any act that violates the person and their dignity, such as workplace harassment in all its expressions, that seeks to violate the rights to a dignified life free of violence, especially sexual harassment, expressed in intimidation, request for favors or sexual conduct regardless of hierarchical level or employment relationship.

- Incorporate into its management practices aligned with Law 27942 "Law on the Prevention and Punishment of Sexual Harassment".
- Promote the prevention and rejection of all types of physical, psychological, sexual and economic violence and all intimidation, according to Law 30364 "Law to Prevent, Punish and Eradicate Violence against Women and Members of the Family Group".

### 3. Mutual responsibilities

## Ethics and integrity



AT PESQUERA DIAMANTE,  
NO GIFT, COURTESY,  
DONATION, TRIPS,  
INVITATIONS OR  
COMMISSIONS FROM  
SUPPLIERS, CUSTOMERS  
AND/OR RELATED THIRD  
PARTIES ARE ACCEPTED.

#### Respect for people

5. **Working hours, salaries and benefits:** ensure that its collaborators work in accordance with applicable laws and mandatory industry standards regarding working hours, wages and competitive benefits, in order to provide a decent standard of living for its employees and their families.
6. **Right of free association:** guarantee the rights of association, affiliation and collective bargaining of its workers, always complying with the applicable regulations.

#### Presents, gifts and courtesy

At **Pesquera Diamante**, we have zero tolerance towards bribery and are committed to acting professionally, impartially and with integrity in all our activities, wherever we operate.

In this sense, collaborators are NOT allowed to offer, request or accept gifts, trips, invitations or commissions from suppliers, customers and/or related third parties, avoiding any suspicion of purchasing wills in negotiations of products, raw materials, supplies or services. for the company, as well as any other activity that the company carries out.

#### IMPORTANT

You can find more information by consulting the Gifts, Presents and Courtesies Management Policy published in <https://www.diamante.com.pe/gobierno-corporativo>



### 3. Mutual responsibilities

## Ethics and integrity

### Occupational health and safety

At PESQUERA DIAMANTE, we promote the development of a safe and healthy work environment, in accordance with current laws. This commitment is transferred to our suppliers, customers and related third parties, with the objective of maintaining and providing a work environment where all health and safety standards at work are encouraged and complied with.

Therefore, we hope that our suppliers, customers and related third parties promote the application of occupational health and safety standards and policies, in line with the PESQUERA DIAMANTE Occupational Health and Safety Management System; must commit to:

- Manage and provide the necessary resources to ensure a safe work environment.
- Identify, evaluate and control hazards and risks throughout the value chain, incorporating preventive measures and controls that guarantee health and safety at all levels and without distinction.
- Comply with and exceed the provisions of legal regulations or other applicable provisions of the sector.
- Actively promote participation and consultation in the execution of the Occupational Health and Safety Management System.
- Train and educate through occupational health and safety programs that promote prevention and awareness on health and safety issues.
- Promote a continuous improvement approach in all activities in accordance with the Occupational Health and Safety Management System.

### 3. Mutual responsibilities

## Ethics and integrity



WE PROMOTE THE DEVELOPMENT OF A SAFE AND HEALTHY WORK ENVIRONMENT, IN ACCORDANCE WITH CURRENT LAWS REGARDING HEALTH AND SAFETY AT WORK.

#### Occupational health and safety

Likewise, PESQUERA DIAMANTE prohibits all personnel of its suppliers, customers or related third parties:

- Entering or performing work on Company facilities under the influence of alcohol or drugs.
- Entering the Company's facilities without complying with the entry requirements requested by it in the support systems available.
- Possession, sale, consumption and distribution of illegal drugs and psychotropic substances at work and its facilities.
- Entering the facilities with firearms or sharp weapons that may affect the integrity of people.

Every supplier, customer or related third party must comply with the policies, procedures, regulations, instructions, plans or programs related to Occupational Safety and Health. Any non-compliance will be subject to consequences in accordance with the "Sanctions" section.

#### IMPORTANT:

*Suppliers who carry out work at PESQUERA DIAMANTE facilities undertake to:*

- *Follow the good relationship guidelines that PESQUERA DIAMANTE applies in its facilities, in accordance with current labor regulations and the agreements, commitments and certifications to which we are a part.*
- *Guarantee proactive communication of the actions and labor aspects of its collaborators who work in our facilities.*

### 3. Mutual responsibilities

## Ethics and integrity



THE CONTINUOUS STRENGTHENING OF THE ASSET SECURITY SYSTEM IS A PRIORITY FOR PESQUERA DIAMANTE, BECAUSE THIS IS THUS WE GUARANTEE THAT OUR PRODUCTS ARE SECURE AND FREE OF TERRORISM, DRUG TRAFFICKING, SMUGGLING, MONEY LAUNDERING AND FRAUD.

### Asset security

At PESQUERA DIAMANTE, we promote the continuous strengthening of the Asset Security System to protect our processes by applying the BASC control and security standards and other related standards, which do not allow us to guarantee that the products manufactured and marketed by the Company are always safe and free of criminal risks, mainly against the threat of terrorism, drug trafficking, smuggling, money laundering and fraud.

In this sense, every supplier, customer and related third party undertakes to:

- Develop necessary internal controls to ensure that workers, partners and customers do not have a history (complaints or lawsuits) related to illicit drug trafficking, robbery (in different modalities), theft (in different modalities), rape, fraud, forgery, documentary and homicide.
- Ensure that all people who enter our headquarters do not have active criminal, police and/or judicial records (complaints or trials), in accordance with the previous paragraph.
- Raise awareness among staff to explicitly follow the instructions given by security personnel at the Company's headquarters.
- Develop a culture of prevention against illegal acts.
- Develop communication policies and procedures in relation to physical (property) security standards, illicit drug trafficking and any other particular criminal event.

### 3. Mutual responsibilities

#### Ethics and integrity



WE ARE COMMITTED TO MEETING THE HIGHEST QUALITY STANDARDS THROUGHOUT OUR VALUE CHAIN, IN ORDER TO DELIVER OUR CUSTOMERS HIGH-QUALITY FINISHED PRODUCTS.

#### Quality Management

At PESQUERA DIAMANTE, we are committed to meeting the highest quality standards throughout our value chain; In this sense, we promote that our suppliers meet the requested quality requirements, set by the applicable laws, rules and regulations when providing the contracted goods and services that adjust to the needs of the Company, with the purpose and commitment to provide the end customer with a high quality finished product.

Regarding the safety of the products supplied, these must comply with the regulations in force in the country where the supply occurs or the final product is delivered. The product must include packaging and labeling, in accordance with the provisions of local regulations and applicable international agreements.

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## Responsibilities to society

### Environment

At PESQUERA DIAMANTE, we have comprehensive management of our environmental management through the integration of actions to ensure compliance with our policies, which commits us to minimizing the impacts generated by our processes, preventing pollution and controlling its fundamental aspects in a significative way. We are committed to working with each and every one of our stakeholders to implement good environmental practices in the sector.

## 4. Responsibilities to society

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Any supplier, customer or related third party must:

- Comply with environmental laws and regulations.
- Promote a culture of environmental protection and the efficient use of resources by seeking solutions and improved technologies to minimize the environmental impact of effluents, emissions and waste management that may be generated.
- Support the implementation of appropriate actions to prevent, control or correct conditions related to environmental risks.



ENVIRONMENTAL  
MANAGEMENT IS  
EVERYONE'S TASK AND WE  
ARE COMMITTED TO THE  
GOOD ENVIRONMENTAL  
PRACTICES OF OUR  
SECTOR.



## 4. Responsibilities to society

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### Responsible fishing supply

At Pesquera Diamante, we are committed to ensuring that our extraction activities meet the highest standards of responsible fishing, with the aim of conserving aquatic resources and promoting their availability in sufficient quantities for present and future generations, in the context of food safety, poverty alleviation and sustainable development.

This commitment extends to our suppliers, customers and related third parties, who must permanently ensure that they contribute to sustainable fishing, reinforcing respect for the safety of human lives and aligning with international standards.

### Community relations

At PESQUERA DIAMANTE, we execute our activities in harmony and creating value for our stakeholders, respecting all applicable legal requirements and others assumed voluntarily by the Company, with the aim of improving the quality of life of the communities in which we live, operate and have impact.

In this sense, all suppliers, customers and related third parties must act with integrity, respect and responsibility with the communities where they interact, promoting a culture of respect for human rights, occupational health and safety, and the environment; aligned with the Principles of the Global Compact; to the Global Reporting Initiative and the Sustainable Development Goals.

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#### IMPORTANT

You can find more information by consulting the Responsible Fishing Supply Policy at <https://www.diamante.com.pe/politica-de-gestion-integrada>

## 4. Responsibilities to society

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### Communication and use of Diamante identity

At PESQUERA DIAMANTE, we safeguard and take care of our institutional image, avoiding risks related to fraud, impersonation or distortion of our brand. That is why, to ensure the veracity of institutional messages, we ask our suppliers to do the following:

- The use of the Diamante logo in institutional communications from suppliers will always have to be consulted with the Company's Communications area.
- Any request for information on behalf of PESQUERA DIAMANTE must be validated by the Communications and Risk and Compliance area.
- Sharing information in written, sound, visual, audiovisual formats within our facilities must have permission from the Communications area on the final product to guarantee that it is the desired message.

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#### *IMPORTANT:*

*Suppliers and related third parties who carry out work in areas of influence of Diamante plants undertake to:*

- *Follow the guidelines and regulations for community relations that the Company maintains in that area.*
- *Guarantee transparent and fluid communication about community actions and aspects that arise.*

## Responsibilities of our business partners

### Supplier responsibilities

At PESQUERA DIAMANTE, we consider our suppliers as an important pillar for the development of the Company's operations. All suppliers are selected in accordance with current internal processes under equal conditions and freedom of competition.

As good practices for the allocation of goods, services and raw materials, we do not maintain contractual ties and/or do not work with suppliers observed for ethical issues associated with the Compliance Program, non-compliance with aspects of safety and health at work and/or bad practices.

## 5. Responsibilities of our business partners

### Environment



ENVIRONMENTAL  
MANAGEMENT IS  
EVERYONE'S TASK AND WE  
ARE COMMITTED TO THE  
GOOD ENVIRONMENTAL  
PRACTICES OF OUR SECTOR.

Any supplier, customer or related third party must:

- Comply with environmental laws and regulations.
- Promote a culture of environmental protection and the efficient use of resources by seeking solutions and improved technologies to minimize the environmental impact of effluents, emissions and waste management that may be generated.
- Support the implementation of appropriate actions to prevent, control or correct conditions related to environmental risks.

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## 5. Responsibilities of our business partners

### Supplier responsibilities



OUR SUPPLIERS ARE AN IMPORTANT PILLAR FOR THE DEVELOPMENT OF DIAMANTE OPERATIONAL ACTIVITIES.

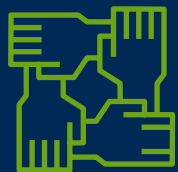
The responsibilities as a supplier of PESQUERA DIAMANTE are:

- Respect and comply with this Code of Ethics and Conduct for suppliers and customers as an active supplier with the Company.
- Strengthen its internal processes with the objective of executing validation activities for its counterparts and selecting and controlling third parties and subcontractors that act on behalf of PESQUERA DIAMANTE.
- Ensure compliance with the processes defined by the company in the field of supplier evaluation management, product or service attention and respective payment management, as well as any other current regulatory document.
- Execute due diligence processes by verifying the background of its collaborators and third parties, with the purpose of guaranteeing the integrity of the Company's value chain.
- Avoid any activity that could give rise to illegal practices or damage our reputation.
- Actively collaborate in investigations and audits, providing all information regarding the incident in a complete and truthful manner.
- Collaborate in the implementation of mitigating or reinforcing controls identified as recommended by PESQUERA DIAMANTE.
- Notify in good faith, through the integrity channel (see section "How to report a potential non-compliance situation?"), any alleged violation of the CODE.
- Ensure that your collaborators, third parties, contractors, agents or subcontractors are selected based on standards of merit and competitiveness and guarantee that they comply with this CODE, internal policies and applicable laws.

## 5. Responsibilities of our business partners

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### Customer responsibilities



OUR INTERNAL PROCESSES GUARANTEE THE INTEGRITY OF SELECTION AND COMMERCIAL LINKS WITH OUR CUSTOMERS.

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At PESQUERA DIAMANTE, we value the business relationship with our customers; In this sense, we have internal processes that guarantee the integrity of selection and commercial links with them. The Company considers non-negotiable considerations in the evaluation process for its customers, who must comply with at least:

- Not having legal background of the representatives of the organization.
- Not be on the Clinton List or the Office of Foreign Assets Control (OFAC).
- Not have a history related to drug trafficking, terrorism or smuggling or a history of data disclosure.

Our customers guarantee that their internal processes are aligned with the best practices, nationally and internationally, in commitment to the Compliance Program, applicable laws and good business practices.

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#### IMPORTANT

*PESQUERA DIAMANTE makes available to its suppliers, customers and related third parties this Code of Ethics and Conduct for suppliers and customers, as well as all policies, procedures and other documents that are applicable to them due to current commercial links.*

## 5. Responsibilities of our business partners

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### Conflict of interest and business with suppliers and customers

At PESQUERA DIAMANTE, we are committed to excellence. Therefore, we establish a Corporate Governance model that seeks to strengthen our ties with suppliers, customers and related third parties. Likewise, we seek to establish guidelines for action regarding the treatment of conflicts of interest.

At all organizational levels and in our dealings with customers, suppliers and related third parties, we avoid those activities or businesses that by their nature generate "conflicts of interest" and put the integrity of the Company at risk, such as:

1. Be a direct or indirect family member of our collaborators and carry out commercial transactions with PESQUERA DIAMANTE.
2. Use discounts or special treatments for your benefit, as a result of the commercial relationship with the Company.  
PESQUERA DIAMANTE does not carry out commercial transactions with suppliers that operate outside the law or that are of dubious reputation, that fail to comply or demonstrate irresponsible social, tax and/or environmental practices, and/or that are not duly authorized for the use and marketing of products and services subscribed to royalty payments or intellectual property rights.
3. All hiring of suppliers identified and/or declared as former collaborators and/or their relatives up to the fourth degree of consanguinity and affinity, directly or indirectly, must compete under the same conditions as any supplier, comply with all the policies of the Diamante's Compliance Program and be brought to the attention of the Risk and Compliance officer for the evaluation of any conflict of interest that may exist.

## 5. Responsibilities of our business partners

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### Conflict of interest and business with suppliers and customers



FAILURE TO REPORT A POTENTIAL CONFLICT OF INTEREST IS A VIOLATION OF THIS CODE. IT IS BETTER TO GO TO THE DIAMANTE RISK AND COMPLIANCE OFFICER TO CLARIFY OUR DOUBTS.

4. Provide gifts, donations, trips, invitations or commissions to our collaborators that may cause the purchase of goods in negotiations of products, raw materials, supplies or services for the Company, as well as any other activity that the Company carries out, except for exceptions in accordance with the internal policies.

In that sense, the PESQUERA DIAMANTE collaborator makes his decisions putting the interests of the Company before private interests.

Our CODE prohibits conflicts of interest; However, we recognize that it is not always easy to determine if there is a conflict of interest, so you can make inquiries about this with the Diamante Risk and Compliance officer.

Any event or possible event of conflict of interest must be reported to the Risk and Compliance officer to establish the necessary mitigation and corrective actions.

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#### **IMPORTANT:**

You can find more information by consulting the Conflict of Interest Policy Prevention Policy, published at <https://www.diamante.com.pe/gobierno-corporativo>



## Putting our CODE into action

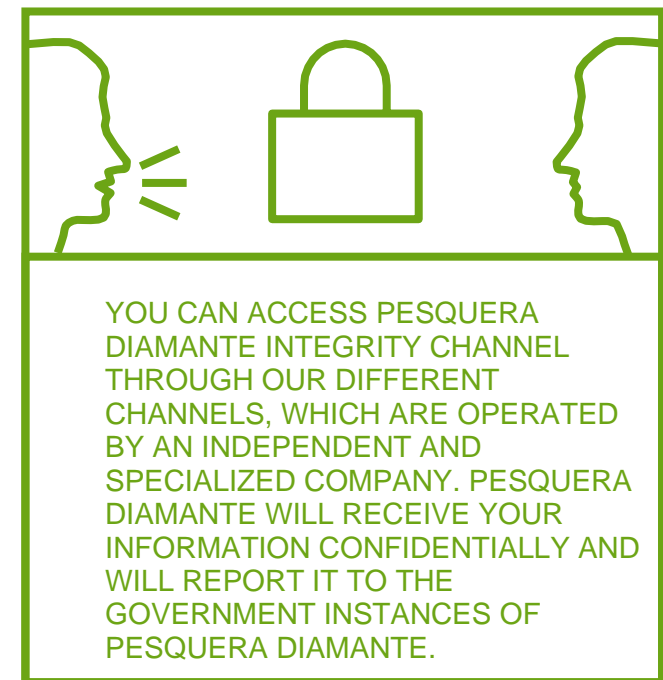
### How to report a potential non-compliance situation?

If you have a concern, report or consider that the conduct of any collaborator, supplier, customer or related third party fails to comply with the provisions of this CODE or the internal policies, it is your duty to raise this information immediately, preventing the issue from becoming a serious problem. We require your help to become aware, be able to evaluate the case and adopt appropriate measures.

## 6. Putting our CODE into action

### How to report a potential non-compliance situation?






The PESQUERA DIAMANTE Integrity Channel is a tool for confidential use, through which collaborators or third parties can report, anonymously and responsibly, their concerns regarding conduct that they consider is not in accordance with the provisions of our CODE or Internal Politics.



## 6. Putting our CODE into action

### How to report a potential non-compliance situation?

#### Channels Managed by the independent operator

	<a href="http://www.canaldeintegridaddiamante.com">www.canaldeintegridaddiamante.com</a>
	<a href="mailto:reportes@canaldeintegridaddiamante.com">reportes@canaldeintegridaddiamante.com</a> Note: the message will be read by the operator.
	0800-1-8140, option 1 (nationwide toll-free number) Available during office hours, weekdays, Monday to Friday from 8:30 a.m. to 6:30 p.m.
	800-1-8140, option 2 (nationwide toll-free number) Available anytime you want.
	Víctor Andrés Belaúnde Avenue 171, San Isidro, Lima 27, Lima, Peru Reference: Diamante Integrity Channel
	Víctor Andrés Belaúnde Avenue 171, San Isidro, Lima 27, Lima, Peru Reference: Diamante Integrity Channel Available during office hours, weekdays, Monday to Friday from 8:30 a.m. to 6:30 p.m. or outside these hours by appointment.

IMPORTANT: For further reference, consult the Diamante Integrity Channel User Guide.

## 5. Putting our CODE into action

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### Sanctions

Failure to comply with the Code of Ethics and Conduct for suppliers and customers is subject to sanctions for our collaborators that range from a verbal or written reprimand, a suspension and even loss of employment, civil or criminal sanctions depending on the fault(s) that is committed.

IF THE NON-COMPLIANCE COMES FROM A SUPPLIER, CUSTOMER AND RELATED THIRD PARTIES, THERE WILL BE THE TERMINATION OF THE CONTRACT AND, THEREFORE, THE TERMINATION OF THE COMMERCIAL RELATIONSHIP, AS WELL AS CIVIL OR CRIMINAL SANCTIONS ACCORDING TO THE FAULT(S) THAT IS COMMITTED.

# Glossary of terms

**Institutional conflict of interest.** Situation that arises when the objectivity of the organization in carrying out the work corresponding to the mandate is or may be affected, or the organization has an unfair competitive advantage.

**Conflict of personal interest.** Situation in which a person's private interests, such as external professional relationships or personal financial assets, interfere or may be understood to interfere with the performance of his or her official duties.

**Integrity channel.** Tool that serves to communicate through various mechanisms (email, website, telephone service, among others) serious and sensitive concerns related to potential irregularities or non-compliance with the Code of Ethics and Conduct.

**Gifts and attentions.** The acceptance of an honor, decoration, favor, gift or remuneration in connection with official duties may give rise to an actual or potential conflict of interest in that it may be considered to create an obligation.

**Duty.** Responsibility of a person, legal or moral, to promote what is in the best interests of an organization or a third party with whom that person is associated.

**Collaborators.** All direct workers who belong to the company.

**Sustainable development.** Development-oriented actions or decisions that satisfy the requirements of the present without compromising the ability of future generations to meet their own needs.

**Interest groups / stakeholders.** Set of individuals or organized groups that can affect, be or feel affected by any decision or activity of a company (whether due to its direct or indirect impact).

**Confidential information.** Restricted access and dissemination information accessible only to those explicitly authorized to know it.

**Privileged information.** That to which only certain people have direct access due to their position, profession or trade.

**Asset laundering.** Process by which it seeks to introduce, into the economic and financial structure of a country, resources (money, goods, effects or profits) coming from illicit activities (illicit drug trafficking, terrorism, illegal mining, among others), with the purpose to give them the appearance of legality.

**Bribery – Corruption.** Intention or act of corrupting someone (public official or in the private sphere) with money, gifts or some favor to obtain an improper benefit. It constitutes a crime when the person who accepts or requests it is an authority or public official.

## Letter of commitment to the Code of Ethics and Conduct

The signatory certifies:

- The reception, reading and understanding of the content of the Code of Ethics and Conduct for suppliers, customers granted by PESQUERA DIAMANTE and understanding the importance and context of the guidelines contained herein.
- Have assumed the commitment to comply with all established standards of ethics and conduct and, in any case, if in doubt, consult the Risk and Compliance officer regarding the interpretation and application of the rules and policies included in this CODE.
- Commit to reporting if any suspicion of non-compliance with this CODE is identified through the communicated channels.
- Commit to retransmit to all its employees, subcontractors or employers, as the case may be, the content of this CODE provided by PESQUERA DIAMANTE, as well as ensure compliance with the provisions included therein.

In this sense, the signatory authorizes PESQUERA DIAMANTE or another third party acting on behalf of PESQUERA DIAMANTE to carry out audits with prior notice, carry out investigations and request information for the same with the objective of verifying compliance with this CODE.

Name of the Company \_\_\_\_\_

Name and position \_\_\_\_\_

Identification document \_\_\_\_\_

Signature \_\_\_\_\_

Date and place \_\_\_\_\_

## Version control

Version	Control panel	Name	Date
01	Elaborated by	<b>Ivonne Román</b> Risk and Compliance Coordinator	
	Reviewed by	<b>Renzo Zea</b> Risk and Compliance Officer	
	Approved by	<b>Pablo Trapunksy</b> General Manager Audit and Risk Committee  Board of Directors	

**Code of Ethics and Conduct for suppliers and customers**

Direction: Ivonne Román

Edition: Melody Toledo

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