

**Bullard+
Falla
Ezcurra**

**RULES AND
PRINCIPLES OF
CONDUCT
GOVERNING THE
PROFESSIONAL
PRACTICE OF
BULLARD FALLA
EZCURRA +**

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Introduction

Continuous improvement of our quality services to clients equires us to put down in writing the rules and principles of conduct followed by the firm's members.

This document contains the ethical framework, values and principles governing the professional practice of those who are part of Bullard, Falla & Ezcurra +.

We reiterate our appreciation for your trust and wish to renew our commitment to professional excellence.

Alfredo Bullard G.

Alejandro Falla J.

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Eduardo Quintana S.

Lucía Villarán E.

Andrea Cadenas C.

Milan Pejnovic D.

Commitment to our Clients

Your commands are, for us, ends in themselves. Therefore, we embrace your objective to ensure a representation aimed at satisfying your interests and, in addition to the objective established in each particular case, utmost efficiency in managing your expenses and costs.

+ Planning and Evaluation

We pledge to make an initial evaluation of your case or consultation that will result in a fee proposal before any hiring takes place. In this proposal, we provide a previous analysis of options and alternatives and an assessment of their value, while defining, planning and sequencing the chief actions to be carried out. We will also include, where appropriate, the calculation of representation costs, including the personnel required, expert fees and reasonable projections of cost and time.

+ Law Firm - Client Relationship

Our commitment is to provide you with the best legal and economic advice in the market in our fields of expertise. We build Law Firm - Client and not Attorney - Client relations. Therefore, we will always inform you which members of the Firm will be part of the team that will handle your queries. However, should you require the participation of any member of the team in particular, we will always strive to offer a customized treatment that will include the active and permanent participation of the partners involved in the service concerned.

Considering your interest in obtaining the best service, the Firm guarantees to avoid:

- + Excessive staffing when no additional value is provided;
- + Charging for new attorneys or economists who need to become acquainted with your query or to replace other members, except in the interest of the case and you have agreed to bear the appropriate expenses;
- + Authorizing premature or additional legal or factual investigations;
- + Holding internal meetings when they do not add value to the case;
- + Charging for the professional reading of new decisions, cases, opinions, among other matters, in order to keep you abreast of all the information, except when required by the services rendered.

Possible Conflicts of Interest

We will disclose to your representatives any conflicts of interest, including potential ones involving the Firm or its members to enable you to make the best decision to suit your interests.

+ Ethical Conflicts and Concurrent Representation

Neither the Firm nor its members will represent a party whose interests are directly contrary to those of our clients, or those of their affiliates, nor will they participate in any manner in cases or matters substantially related to those commissioned by the client. If so, we will inform you or request your acquiescence, as appropriate.

Similarly, any circumstance where the Firm has represented in the past a party directly contrary to your interests in substantially related matters, or issued opinions that may be in conflict with your position will be timely informed to you so that you can make the best decision in this regard.

Relationship with Third Parties and Administrative, Judicial and Arbitral Institution

+ Sham Litigation Policy

We are against the use of tactics that involve unnecessary coercion, delay or obstruction. We will also avoid insisting that the opposing party rigidly comply with purely procedural formalities, especially when meeting such requirements generates unnecessary costs, unless this is the only recourse to avoid a tactical disadvantage. Moreover, we do not facilitate the abuse of legal proceedings that are detrimental to third parties; as well as the filing of evidence that is only intended to generate unreasonable additional costs for the opposing party.

+ Unnecessary Costs

In general, we hope that you will be willing to resolve any disputes and queries as expeditiously and cost-effectively as possible.

Our activities are geared towards informing you of our best estimate of success in a case to enable you to make an informed decision. It is not our policy to exaggerate the true chances of success. When your case has a limited chance of successful outcome, we will inform you in due time. Likewise, when an agreement or settlement is in your best interest, we will also inform you so that you can make the most convenient decision.

+ Anti-Corruption Policy

Our Firm upholds the highest standard of integrity when dealing with government officials, authorities and members of the private sector. In that connection, we assure you that our legal strategy will always be consistent with your business goals and objectives, as long as it does not violate the ethical rules and standards we pursue.

We reject any suggestions to offer gifts or make payments that are intended to influence, or purport to influence, the decisions of third parties, particularly governmental, administrative, judicial or arbitral authorities. We do not propose, arrange for or pay kickbacks or use any other similar mechanism intended to illegally influence the decision-making authority.

Should we become aware that your principal or your affiliates have performed any act that may undermine the ethical integrity of our Firm's members or third parties, such as administrative, judicial or arbitral institutions, we reserve the right to automatically terminate our relationship with you and your affiliates or related parties.

+ **Prohibition, Prevention and Measures against Sexual Harassment Acts**

The parties undertake to carry out all measures to prevent, avoid and punish acts of sexual harassment during the relationship with BFE, in accordance with Peruvian legislation and the Protocol for the prevention, detection and punishment of acts of sexual harassment of BFE.

Without prejudice to any applicable legal actions, BFE will evaluate any alleged act of sexual harassment carried out by clients, experts, witnesses and / or third parties during the relationship with BFE, based on the aforementioned Protocol, and reserves the right to do so. Right to unilaterally terminate the contractual relationship. Acceptance of this Code implies consent to the aforementioned actions by BFE and to provide the necessary collaboration to carry them out.

Billing and Expense Policies

As a law firm, we are committed to providing you with effective and efficient legal advice, ensuring the quality of service and avoiding unnecessary costs. We also commit to keep you abreast of our billing policies and any changes thereto. In particular, we are committed to:

- + Billing the time spent by the assigned team members according to the approach mutually defined as most suitable to your interests.
- + As agreed with you, the time spent by team members may be billed on a flat fee basis or on the basis of hours actually spent on your case. If, as a result of new developments or a new evaluation of the case, the approach needs redirection, we will contact you reasonably in advance in order to arrange for the approach that best suits your interests and the requirements of your consultation or procedure.
- + Informing you, when evaluating the case, any expenses related to a service actually provided that may be passed on to you. Without prejudice to the fact that each particular case is subject to your approval, in principle, the Firm will only transfer expenses to you for:
 - + Photocopies and/or printouts from external suppliers, if necessary for your interests.
 - + Long distance phone calls, if coordination is necessary.
 - + Local and international trips and time involved, in case the defense of your interests requires the relocation of team members. We commit to making the necessary arrangements with you as regards such expenses.
 - + Third-party expenses, should the defense of your interests require third-party services. We undertake to discuss with you the necessary arrangements to define the scope of such service and the amount to be paid. .

Data Privacy

As outside counsel, we undertake to exercise the necessary due diligence and ensure the confidentiality of any information that may be sensitive to your interests, whether disclosed to us by you or obtained directly by us. This obligation extends to members of our Firm who have had access to your information, even if they no longer work for our Firm. In particular, we undertake to:

- + Contact you to confirm, when in doubt, the confidential or proprietary nature of any information disclosed by you or obtained by us.
- + Maintain the confidentiality and privacy of any information as necessary, according to its nature and as per your instructions.
- + Under no circumstances, disclose to third parties any confidential information related to the proceeding or procedure, except with your express authorization.
- + Request your express authorization to bring into the proceeding or procedure information that, based on the above points, must be kept secret and confidential. If allowed by the rules of the proceeding or procedure, we undertake to request the administrative or arbitration tribunal or other competent authority that such information be kept confidential and beyond third-party access.
- + Avoid making statements or disseminating information in media open to third-party access, unless you have expressly authorized the Firm to do so. Any press request sent to us regarding a proceeding or procedure related to your interests will be forwarded to you in order to secure such authorization or to arrange for the actions to be taken.
- + Coordinate with you to determine whether any information requires further protection in addition to the above. If you so require, certain information may be accessed only by certain members of the Firm's in-house team, or may receive special protection.
- + Coordinate with you the return or destruction of information related to your query or dispute, after a reasonable period of time has elapsed since its resolution and when it is not necessary to keep such information in our possession. Until these arrangements are made, we undertake to keep the information on file with the Firm. If deemed necessary or convenient, we commit ourselves to make arrangements with you to keep such information in the Firm and to define the applicable storage cost.