



CORRUPTION PREVENTION POLICY

AUGUST 2020

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Hunt Oil Exploration and Production Company of Peru L.L.C., Sucursal del Perú (hereinafter the “Company”) carries out its activities in compliance with strict standards of excellence and ethics, including the prevention and fight against corruption, in accordance with the provisions of current regulations on the subject; which includes but is not limited to: (i) the Law No. 30424 – Law that regulates the liability of legal entities; (ii) the Regulation under Law No. 30424, approved by Supreme Decree No. 002-2019-JUS; and, (iii) articles 241-A and 241-B included in the Criminal Code as provided for in Legislative Decree No. 1385; as well as (iv) their amending and complementary regulations.

Thus, within the framework of the regulations above mentioned, the Company has decided to approve this Policy for the Prevention of Corruption (hereinafter, the “**Policy**”), which aims to promote zero tolerance against corruption. In turn, through the Policy the Company has decided to approve the System for Prevention of Corruption (hereinafter, the “**Prevention System**”), whose text consists of Annex 1 that integrates this document.

The Company has expressly agreed that the Policy and the Prevention System will be applied transversally within its organization, being mandatory for its employees, representatives, managers and officers, as well as for its business partners and interested parties, as applicable, who must commit to reject corruption offenses and adhere to the terms and conditions established in the Policy and the Prevention System. This way, the Company generates a chain of ethical value in the market and in society.

Within the framework of this Policy, the Prevention System establishes the criteria, premises, guidelines, procedures and controls that govern the Company regarding matters related to preventing and fighting against corruption in compliance with applicable regulations.

Both the Policy and the Prevention System are endorsed by the Company’s senior management, which is absolutely committed to: (i) encouraging its correct implementation; and (ii) preventing and fighting against corruption.

This commitment and leadership are reflected in a clear, visible and accessible way in the following:

- The creation of a culture of zero tolerance for corruption, as well as rejecting this type of crimes.
- The Code of Conduct, through which all members of the Company undertake not to commit corruption offenses and contribute to the proper functioning of the Prevention System.
- The approval of guidelines and/or mechanisms that recognize and promote the timely communication of any indication of the possible commission of a crime of corruption, under confidentiality, security and protection of whistleblowers conditions.
- The conservation and filing of the documentation that supports the implementation and execution of the Policy and the Prevention System, by carrying out internal and external activities of the Company.

Finally, it should be noted that the Prevention System has been prepared in accordance with the Regulation of Law No. 30424, approved by Supreme Decree No. 002-2019-JUS.