

# ANTI-BRIBERY POLICY

Code: RDL-POL-SGAS-01



The Rutas de Lima Concessionaire is in charge of the concession of three road thoroughfares comprising the Panamericana Norte (from the Habich Exchange to the Ancon Exchange), the Panamericana Sur (from the exchange of Javier Prado to the Pucusana bridge), and the Ramiro Prialé Highway that will extend an additional 19 km up to the Los Angeles bridge.

Our company applies international standards for Anti-Bribery Management and is committed to fully complying with the principles of the Code of Ethics and the ABC Policy.

The pillars of our anti-bribery management are based on our commitment to the following:

- Promote the raising of concerns in good faith or based on a reasonable belief, in confidence and without fear of reprisals.
- Prohibit bribery and correct any behavior that does not comply with the anti-bribery policy applying the company's sanctions system.
- Comply with anti-bribery legislation and the requirements of the anti-bribery management system.
- Guarantee the authority and independence of an anti-bribery compliance function, assigning it with appropriate resources and capabilities to ensure the correct implementation of the Anti-Bribery Management System. Also charged with guiding and explaining the System to RDL Personnel, ensuring it is compliant with the requirements and report on its performance.
- Appoint and empower, with full authority and independence of its functions.
- Raise awareness and train the organization's personnel in the prevention of bribery.
- Promote the continuous improvement in the company and the Anti-Bribery Management System.

The Leadership, responsibility, and accountability regarding the effectiveness of the Anti-Bribery Management System is implemented as follows:

- The Steering Committee has the Strategic Institutional Responsibility.
- The Department Heads has the Business Responsibility.
- All members of the Company have Operational Responsibility.

Lima, november 3rd 2022.

**Miguel Oyarzo Vidal**  
General Manager  
**Rutas de Lima S.A.C.**