1. General Ethical Guidelines of the Company

Commitment to excellence is fundamental at **MEASURING ENGINEER GROUP PERU S.A.C.** Therefore, it is important to maintain appropriate ethical standards within the company to safeguard its reputation. All employees must conduct themselves and act properly at all times and under any circumstances.

Compliance with the Code of Ethics is mandatory for all employees of the company. Everyone has the obligation and the right to be familiar with these provisions to foster and maintain a harmonious work environment.

MEASURING ENGINEER GROUP PERU S.A.C. provides this Code of Ethics to all staff members, who are expected to practice its principles, rules, and duties.

In summary, the ethics required by this code mean:

- Acting with honesty and integrity with all our stakeholders, including employees, customers, suppliers, and others with whom **MEASURING ENGINEER GROUP PERU S.A.C.** has a relationship.
- Maintaining impartiality, dignity, and respect to create an environment free from harassment and discrimination.
- Complying with all applicable laws and regulations.
- Promoting the reporting of any violations of this code.

MEASURING ENGINEER GROUP PERU S.A.C. is obligated to disseminate this Code of Ethics to all personnel in general, who are under the duty to know it and request clarifications on the information contained in this document from their immediate supervisor, Human Talent Management ***Area or Anti-Bribery Function***

2. Objective

The objective is to establish the principles, duties, and ethical standards that employees must understand and follow to ensure the proper functioning of the Anti-Bribery Management System.

3. Scope

This Code of Ethics applies to all employees, including managers and staff. It is intended to serve as a guide in performing their duties.

In case of any conflict between this Code and current regulations, the provisions of the latter shall prevail.

Compliance with the Code of Ethics is mandatory for all employees, who have the right and duty to know and adhere to these provisions.

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4. Glossary

- Ethics: A set of moral norms that govern human behavior.
- Conflict of Interest: Situations in which employees face decisions where their personal interests conflict with those of the company, its suppliers, shareholders, investors, stakeholders, and/or third parties, potentially affecting their ability to make objective decisions in the best interest of the company.
- Stakeholders: Individuals or groups affected directly or indirectly by the company's activities, decisions, or operations.
- Confidential Information: Any restricted-access information or documents belonging to the company that have not been classified as public.

5. Anti-bribery function

The Compliance Officer's primary objective is to oversee the design, implementation, and monitoring of the Anti-Bribery Management System (SGA).

The Compliance Officer has direct and rapid access to senior management should any issue or concern related to corruption or the anti-bribery system need to be escalated.

The Compliance Officer is responsible for:

- Continuously promoting and supervising the implementation and effectiveness of the SGA.
- Provide advice and guidance to staff ***and stakeholders*** on the EMS ***and bribery-related issues.***
- Ensuring that the SGA complies with the requirements of this document.
- Reporting on the SGA's performance to Senior Management and other relevant compliance functions.

6. Policies, Rules, and Practices

All staff members of **MEASURING ENGINEER GROUP PERU S.A.C.** are subject to this code and must comply with the following ethical guidelines:

6.1. Due Diligence

Individuals subject to this Code must ensure that all published company information is accurate, clear, sufficient, and timely, providing honest and reliable communication about its activities.

6.2. Confidential Information.

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It is vital to safeguard the confidential information of **MEASURING ENGINEER GROUP PERU S.A.C.** Individuals subject to this Code must not disclose such information to anyone outside the company unless authorized by General Management or required by legal authority. This includes trade secrets, technology, proprietary information, R&D, customer and supplier lists, markets, pricing, projects, financial data, business plans, and personal data of employees, clients, and others. All files, records, and reports created or obtained during employment remain the property of **MEASURING ENGINEER GROUP PERU S.A.C.** Former employees must continue to protect confidential information after leaving the company.

6.3. Conflict of Interest.

All staff must avoid activities that may compromise or appear to compromise their judgment or objectivity in performing their duties for **MEASURING ENGINEER GROUP PERU S.A.C.**

Employees must disclose any potential conflict of interest in which they may be directly or indirectly involved to their immediate supervisor, the Human Talent Management ***Area***, or ***the Anti-Bribery Function.***

This conflict arises when the interests of the persons subject to this Code, or those of their family or related third parties, are contrary to, interfere with, or may interfere in any way with the interests of **MEASURING ENGINEER GROUP PERU S.A.C.**

Examples include:

- Being employed or holding significant interest in a client, supplier, or competitor.
- Receiving gifts, loans, favors, or discounts from suppliers without explicit company authorization.
- Personal gain from company assets.
- Using confidential information to the company's detriment.

6.4. Safeguarding and Proper Use of Assets

All employees are responsible for the proper use and protection of the company's assets, including tangible and intangible property, documents, and information. Assets must be used only for legitimate company purposes. Any employee caught stealing company assets—

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including documents, IP, money, or personal property—will be immediately dismissed and may face legal action.

6.5. Compliance with Laws

All employees must ensure compliance with national and international laws, regulations, and provisions applicable to the company. **MEASURING ENGINEER GROUP PERU S.A.C.** is firmly committed to observing all applicable legal frameworks.

6.6. Gifts, Hospitality, Donations, and Benefits

MEASURING ENGINEER GROUP PERU S.A.C. strictly prohibits offering, paying, soliciting, or accepting bribes in any form, either directly or indirectly, except for promotional items defined in the procedure "Control of Gifts, Hospitality, Donations, and Similar Benefits."

Any transaction of this nature must be immediately reported to your immediate supervisor, the Human Talent Management ***Area***, or ***the Anti-Bribery Function.***

6.7. Political Activities and Contributions

The company and its employees do not make political contributions of any kind. The company does not engage in political activities and prohibits political proselytizing at its workplaces, while respecting employees' personal political views and private political engagement.

6.8. Fulfillment of Duties

All employees must fully meet their responsibilities and goals, putting forth their best effort with honesty and principles, and complying with their work schedules. They must also fulfill any verbal or written commitments made to their direct supervisors.

6.9. Facilitation Payments

Improper or unofficial payments to obtain or expedite routine actions are not permitted at **MEASURING ENGINEER GROUP PERU S.A.C.**

7. Anonymous or Ordinary Reporting Channel

A communication channel exists to allow employees to report, anonymously or otherwise, any concerns or violations related to company matters. This channel is accessible through:

- Email: cerocorrupcion@megperu.com
- In-person training for ***the Anti-Bribery Function***
- Website: www.megperu.pe

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Reports may relate to financial irregularities, fraud, unethical practices, employee mistreatment or harassment, asset misuse, legal violations, or breaches of this Code of Ethics.

Employees may submit anonymous reports with confidence that their identity will remain confidential and that no sanctions will be imposed on whistleblowers.

MEASURING ENGINEER GROUP PERU S.A.C. will not investigate the identity of anonymous reporters or take retaliatory action.

Any individual found to retaliate will be sanctioned and may be terminated.

8. Compliance with the Code of Ethics

The Code of Ethics reflects the general principles guiding employees in ethical decision-making. All employees are responsible for complying with it. **MEASURING ENGINEER GROUP PERU S.A.C.** expects employees to act with honesty and integrity. Any violations may result in:

- Verbal warning
- Written warning
- Termination
- Legal reporting to regulatory authorities

If an employee is unsure whether a situation may violate this Code, they should report it to the ***Anti-Bribery Function***.

9. Reporting Possible Violations

Employees who are aware of or suspect any violation of the Code must report it to their immediate supervisor, Human Talent Management Area, or ***Anti-Bribery Function***. If it would be inappropriate to report to them, the employee should use the anonymous channel via cerocorrupcion@megperu.com

All employees have both the right and responsibility to report suspected violations, and the company will provide full support for such reports.

10. Sanctions

Violations of the principles and rules in this Code will be subject to sanctions proportional to the severity of the infraction, applied in accordance with applicable legal regulations. Penalties may include termination of employment, as outlined in the Internal Work Regulations. Sanctions will be applied by General Management after proper investigation and confirmation of the violation.

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11. Anexo

I, _____, with ID No.: _____, declare that I have received, read, and fully understood the Code of Ethics of MEASURING ENGINEER GROUP PERU S.A.C., and I commit to complying with it in my daily conduct within the company, abiding by the penalties established for any non-compliance.
Date:
Signature:

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