

COLEGIO DE TRADUCTORES DEL PERÚ

Creado por Ley N° 26684

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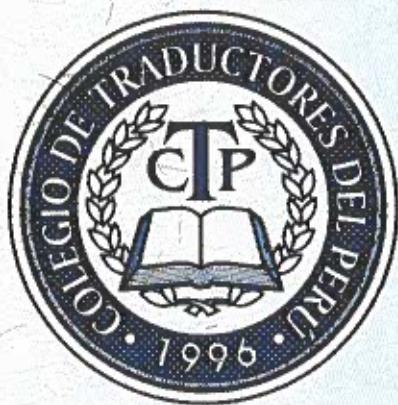
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CERTIFIED TRANSLATION

TC N° 0770-2019

CODE OF ETHICS




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Valor 3.50 Soles

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1. PRESENTATION

Dear collaborators:

The purpose of this Code is to present an ethical framework that guides the behavior of all of us who integrate **DIAGNÓSTICO UAL S.A.C.**; therefore, everyone's commitment to comply with corporate values translated in policies approved by the company present in the Code of Ethics is expected, as well as collaboration with suggestions to improve and strengthen this tool that guides and inspires us.

These values are also the foundation of trust that shareholders have placed in all those who collaborate with the organization. Maintaining the image of **DIAGNÓSTICO UAL S.A.C.** is a responsibility that concerns us all, because with our daily actions we express its business philosophy. In order to support us in fulfilling this important responsibility, this Code of Ethics was prepared so that those of us who work at **DIAGNÓSTICO UAL S.A.C.** have clear ideas and criteria for action that guide our performance, regardless of our position or place where we are representing the company.

I invite you to read and reflect on the content of this Code of Ethics, to ask any questions you might have about it and make it part of your daily actions. To the extent that we all know this document, disseminate it and first of all make it a way of life in the organization, including the spirit of integrity that motivates it, we will be fulfilling the responsibility we have towards ourselves, our families, **DIAGNÓSTICO UAL S.A.C.** and its shareholders and, ultimately, the company in general.

Best regards,

(Signature)
Lily Otiniano Erroch
General Manager

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2. MISSION, VISION

MISSION:

We provide scalable comprehensive solutions for Blood Bank, Clinical Laboratory and Molecular Biology with ethics, professionalism and competitiveness.

VISION:

In the year 2021, to be the best positioned company nationwide in the provision of scalable comprehensive solutions for Blood Bank, Clinical Laboratory and Molecular Biology.

Our mission and vision represent our foundations, which guarantee us a solid structure, capable of achieving major goals.

We are a Company that stands out for its growth, efficiency and quality of service. What forces us to have collaborators with a good attitude that anticipate the needs, are dynamic, creative, with sense of belonging, that work as a team and are flexible. Worthy representatives of the pride of **DIAGNÓSTICO UAL S.A.C.**

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3. CORPORATE VALUES

INTEGRITY	We consistently demonstrate that the way we act and make decisions goes hand in hand with what we say and do.
RESPONSIBILITY	We are aware of the needs of our customers, we listen to them and assist them respectfully and timely.
COMMITMENT	We create and maintain professional relationships in an environment of trust. We want each project to improve its competitiveness and increase its profit.
HONESTY	We behave and express ourselves with sincerity and coherence.
TRANSPARENCY	Our actions are public and within the framework of the Law.

4. REGULATORY ASPECTS:

This Code determines the responsibilities assumed by collaborators of **DIAGNÓSTICO UAL S.A.C.** with the organization.

4.1 Compliance with local laws and regulations

- a) Respect and observance of national legislation; national and international conventions and policies approved by the company, as an ethical commitment, promoting a sustainable and competitive business context. (See annex 5.3).
- b) The company, through its collaborators, competes in the markets in a loyal and transparent manner, complying with current legislation, promoting free competition.
- c) In the procedures for selecting suppliers and business relationships with the company's customers, the collaborators of **DIAGNÓSTICO UAL S.A.C.** consider, in the exercise of their duties, only those who comply with tax and labor legislation, with special attention to aspects that avoid child labor and adverse environmental impacts.

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4.2 Confidentiality

Any information that is not in the public domain must be protected, even when there is no formal obligation of confidentiality. This also applies to information regarding **DIAGNÓSTICO UAL S.A.C.**, its employees and third parties.

The competitive advantage of **DIAGNÓSTICO UAL S.A.C.**, comes fundamentally from sensitive scientific, technical and business information. It is a very valuable information for our activity, and communicating it improperly or accidentally, in addition to damaging the competitiveness of the company, it can be a malicious act or unfair competition (forgery, industrial espionage). The risks related to hacking of computer files, viruses and similar practices constitute a constant threat and affect all employees.

Thus, all necessary measures must be taken to protect such information (regardless of the medium in which it is stored) and keep it in a safe place. In addition, communicating such information may mean breach of confidentiality commitments assumed by **DIAGNÓSTICO UAL S.A.C.** to third parties (for example, to the owner of a product whose license has been granted to us or to a partner in an alliance of companies) or may result in the disclosure of privileged information.

Therefore, sensitive information must be protected. Any situation in which your communication is proposed outside the company, even in the course of negotiations with a third party, should be carefully analyzed.

Information related to the following issues is part of the internal information:

- Financial results
- Procurement or divestment projects
- Granting of the authorization for the commercialization of a new product
- Loss or achievement of an important contract
- Litigations in progress

4.3 Conflict of interests

Collaborators may find themselves in situations where there is a risk that their personal interests conflict with the interests of the company. Any conflict of interest, real or potential, can lead to problems and damage the reputation of **DIAGNÓSTICO UAL S.A.C.** (See annex 5.4).

"Personal interests" should be interpreted broadly; they do not only include the interests of the collaborator, but also those of his/her close families (whether other people or companies). In order to avoid conflicts of interest, collaborators must protect themselves against situations in which the objectivity of their business decisions may be impaired, such as:

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- a) Collaborators must inform their immediate boss in advance in the case of an investment in a competing company, supplier or customer. This decision must be communicated whether it involves the acquisition of a stake in it (provided that it is not a question of the purchase of shares of a listed company) or in the performance of an economic activity.
- b) These are situations that may damage the expected objectivity of the collaborators of **DIAGNÓSTICO UAL S.A.C.** when they act on its behalf. Although they can participate in non-profit activities in their personal capacity, they must ensure that this does not imply a conflict of interest with the company.
- c) We respect the political opinions and personal convictions of our collaborators, but the expression of such beliefs or commitments must remain in the personal environment (that is, outside working hours and strictly under their responsibility).
Thus, our collaborators have a formal prohibition of not committing the company to any type of political activism or manifestation mentioning the name of **DIAGNÓSTICO UAL S.A.C.** or using your corporate role, funds or resources. Similarly, the company's facilities cannot be used for personal political activities.
- d) No official or collaborator should benefit from confidential information, or business opportunities that are accessed as a result of our position in the company.
- e) Collaborators who have some influence in the purchase of goods or services should not be involved in personal investments related to them.
- f) The company will be represented before customers, suppliers, competitors or public or private organizations, only with the express authorization of the General Manager of the company, except in those cases where it is implicit in the responsibility of the position.
- g) Company's funds must not be used for particular purposes, under any circumstances.

4.4 Ethical conduct and anti-corruption provisions

The commitment of **DIAGNÓSTICO UAL S.A.C.** to deal legally and ethically with the governments of other countries is a fundamental principle.

All collaborators of **DIAGNÓSTICO UAL S.A.C.** must work to ensure that we are always the first choice for our customers.

DIAGNÓSTICO UAL S.A.C. is a business oriented to give the customer the best attention, dedication and attitude.

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Interactions with professionals of health, science and others must be transparent; to do this, collaborators must provide reliable information on products, services and prices to facilitate purchasing decisions, based on real and objective characteristics.

Suppliers of **DIAGNÓSTICO UAL S.A.C.** cannot act in any way, within the framework of their commercial relationship with **DIAGNÓSTICO UAL S.A.C.**, or in any other way, infringing national legislation or any other law against bribery in the world.

Recently, the fight against corruption has reached global dimensions and has intensified, mainly thanks to the strengthening of international treaties and national anti-corruption legislation. (See annex 5.1).

In that sense, **DIAGNÓSTICO UAL S.A.C.**, its collaborators and suppliers know and strictly observe what is established in:

- i. Law N° 30424, "Law regulating the administrative responsibility of legal persons" and its amendments, Legislative Decree N° 1352 and Law N° 30835;
- ii. Legislative Decree N° 1385, "Legislative Decree punishing corruption in the private environment";
- iii. Regulation of Law N° 30424 approved by Supreme Decree N° 002-2019-JUS;
- iv. The requirements established by ISO 37001
- v. International regulations designed to prevent and punish corruption such as the US Foreign Corruption Practices Act (FCPA) and other similar laws.

Therefore, none of the actions of our collaborators can be aimed at:

- i. Inducing a functionary or public servant to do or stop doing something that falls within his jurisdiction to favor **DIAGNÓSTICO UAL S.A.C.**, or that he exerts his influence in any official act or decision or to collaborate with the company in obtaining or retaining business or in the possibility of obtaining any inappropriate advantage, or using third parties for any of the above-mentioned purposes;
- ii. Paying or donating any value, directly or indirectly to a functionary or public servant of a national or foreign government or political party in order to influence a law or decision under his/her jurisdiction or to induce them to use the influence of his/her party with that government to obtain or conserve **DIAGNÓSTICO UAL S.A.C.** business (See annex 5.2).

In that sense:

- a) When in doubt about whether a transaction is allowed, your immediate boss should be consulted and he, in turn, should consult the company's legal advisor.

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- b) Proceed using common sense and proportionality based on the annual income of the company when offering marketing meetings, promotional events or training related to the commercial activity of the company or gifts of symbolic value to avoid any impression of dishonesty or conflict of interest, complying with the policies that the company approves for these purposes.
- c) Decision-making is based exclusively on professional criteria, ensuring that hierarchical position, activity and influence are not used to obtain personal benefits.

4.5 Prohibition of financing political campaigns

- a) No one may act as a representative of the company in political matters without the specific authorization of the General Manager.
- b) The resources and reputation of the company should not be used for any type of political activity.
- c) The company will not be involved in the country's party politics issues. This should not be interpreted as a prohibition of the legitimate and justified manifestation of the company's opinion on matters that may have economic repercussions for it or its business.
- d) Officials or collaborators should not exert any pressure, directly or indirectly, on other collaborators to make political contributions or to participate in support of a political party, issue or candidate.
- e) The company admits that its officials and managers develop appropriate labor relations with government representatives and state functionaries and their administrative bodies.
- f) The contracts and agreements we sign with the public authority obey the legal norms and respect the moral prescriptions, in a transparent way. More than meeting bureaucratic demands, this ensures fair and professional relationships.
- g) Avoid demonstrating any preference for acts or statements of government agents and refrain from making any type of public comment of a political nature, except for the possibility of analysis by duly authorized representatives.
- h) Naturally, opinions of a personal nature can be expressed, provided there is an express declaration that they do not represent the position of the company.

4.6 Use of internet and email

Personnel who have received an Internet connection have received such connection to be used in the work activity. Do not download information that is not in the public domain or that is proper or inappropriate for commercial matters.

In that sense:

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- a) Collaborators should not abuse Internet access for personal purposes.
- b) Company collaborators must proceed with the same care, caution and formality when sending a message via email in the same way they would in a normal written statement. They must ensure that the emails are professional and appropriate to the circumstances.
- c) The company will not accept emails that are abusive, obscene, offensive or foul.
- d) Since the email system is a resource of the company, it may, in special circumstances, have the need to examine it and, therefore, reserves the right to read all communications by email.
- e) Copyright must be respected and all relevant laws and regulations regarding the use and copying of computer programs must be followed.
- f) Copies of any third-party computer program will not be made, unless the copy is an authorized substitute copy or the computer program license specifically allows the copy to be made.
- g) Those who have been hired to design computer programs will not copy or consult any of the lines of the Code written by a third party without the written permission of the third party.

4.7 Environment, safety and health

- a) The company complies with all relevant laws and regulations in relation to environmental protection and safety and health in the workplace.
- b) The company promotes and protects the health and safety of all collaborators, the environment and the community. It establishes mechanisms that guarantee the safety of personnel and the operation of the industry.
- c) Those responsible and those directly involved in monitoring environmental, safety and health regulations should familiarize themselves with the requirements of current laws and regulations, and maintain the corresponding records.
- d) Incidents that include: environmental pollution, health or safety circumstances that are likely to expose the company or those who work in it to adverse consequences, should be reported immediately to the General Management and the Occupational Health and Safety Committees. Such facts should be presented as soon as possible and, in all cases, no later than 24 hours after the incident occurred.

4.8 Safety, hygiene, care of the workplace

- a) The company is committed to providing collaborators with a healthy and safe work environment, free of all recognized hazards.
- b) All safety rules and practices must be followed, and responsibility for taking the necessary precautions to protect oneself and collaborators must be assumed.

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c) All collaborators are responsible for immediately reporting accidents, unsafe practices or conditions and potentially volatile or high-risk situations in the workplace to the immediate superior or area manager.

d) Workplace safety goes beyond company property and includes establishments of customers, suppliers and meeting places outside our offices.

4.9 Our commitment to safety

All collaborators must:

- Take care of the health and safety of the rest of the collaborators.
- Participate in activities related to health and safety, when required.
- Respect and care for facilities and equipment.
- Promote the image of the company as a company committed to safety and the environment.
- Know, apply and observe safety measures in the work environment.
- Provide information to society when required about the environmental performance and specific safety aspects of the company in a transparent manner.

It is not allowed to:

- Act irresponsibly putting the safety of other people and the facilities at risk.
- Refrain from participating in health, safety and environmental protection programs.
- Offer products without informing about their characteristics based on environmental impact and safety.
- Overlooking the unsafe acts of suppliers, contractors, service providers and their personnel.
- Endanger the health and safety of the residents of the communities.

4.10 Violence in the workplace

- Violent acts or threats of violence by a director or collaborator against another person or his/her family or property are unacceptable and constitute grounds for immediate termination or dismissal. This policy is applicable to threats manifested on the property of the company or a customer or under other circumstances that may adversely affect the company. Such acts or threats of violence, whether carried out directly or indirectly, through words, gestures or symbols, violate the company's ability to provide a safe workplace for personnel.
- If you have been subjected to violence or threats of violence, or have witnessed or otherwise learned of violent behavior or threats, you should contact your immediate superior or boss and if the situation is urgent and requires it, to the local police.

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4.11 Weapons

- a) Possession of personal weapons by a collaborator at any time in establishments of the company or of a customer, or in business of the company located anywhere, is strictly prohibited.
- b) A collaborator who goes to work with a weapon or is found in possession of a weapon while at work or in business of the company will be subject to the corresponding disciplinary action, which may even be the immediate termination or dismissal.

4.12 Drugs and alcohol in the workplace

- a) The company is committed to providing and maintaining a safe and drug-free work environment that encourages optimal productivity and service to customers.
- b) Abuse of alcohol or any drug or other substance, both legal and illegal, may interfere with the ability to fulfill professional responsibilities and obligations; endanger the health and safety of the user and third parties; damage the reputation and business of the company and generate a legal risk.
- c) Therefore, abuse of alcohol, drugs or other substances in the workplace is prohibited and subject to disciplinary actions by the company and, in the case of illegal drugs, legal actions.
- d) In addition, it is prohibited for personnel to conduct business of the company or represent the company while they are under the influence of alcohol or drugs, or while generating a reasonable perception that they are under such influence.
- e) The company prohibits the manufacture, possession, sale, use, transfer or transport of any illegal drug or non-authorized controlled substance at any time in the company's establishments, meetings outside the establishment or establishments of the customer.

4.13 Sexual harassment

Sexual harassment, bullying or abuse in any of their expressions or forms (verbal, psychological or physical) as well as the conditioning of hiring, performance evaluations, promotion in exchange for giving in to sexual demands is prohibited.

4.14 Child labor

We comply with current legislation that prohibits the hiring of minors, and, in addition, we encourage compliance with these regulations with our various stakeholders.

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4.15 Report Channel-Ethics Line

The report of potentially corrupt or criminal behaviors is very valuable for the organization because it contributes to the prevention of those crimes that negatively impact the achievement of the objectives and the permanence of the company in the market.

Any member of the Organization or Business Partner can access the ethics line of our website. The ethics line is the report and consultation channel defined by the organization to deal with any situation that could involve some type of criminal behavior, under the responsibility of the Compliance Officer.

The Report Channel that allows the CONFIDENTIAL formulation of reports and consultations in good faith.

4.16 Noncompliance


The violation of both the rules contained in this Code of Ethics, as well as the policies approved by DIAGNÓSTICO UAL S.A.C., will be subject not only to disciplinary actions by the company even until dismissal, in accordance with the provisions of the Internal Labor Regulations, but also to legal actions before the relevant authorities.

(Signature) Lily Gladys Otiniano Erroch - General Manager - Diagnostico UAL S.A.C.

(Signature and seal) GENERAL MANAGEMENT - Approved - DIAGNÓSTICO UAL S.A.C.

I, the undersigned Certified Translator, Member of the Peruvian Association of Professional Licensed Translators (CTP), do hereby certify that this Certified Translation, consisting of 12 pages, is a true and correct translation into English of the original document in Spanish enclosed herewith, which has been produced before me.
this certification shall be considered an acknowledgment of the accuracy of the translation but not of the authenticity or contents of the document in source language attached hereto.
Signed in Lima, this 23rd day of August, 2019




Liz Arteaga Ulfe
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