

**LIZ TATIANA ARTEAGA ULFE**

**CTP N° 0353**

*Certified Translator*

*Spanish – English – French*

*Calle Porta 170, Oficina 912, Miraflores*

*Phone. 447 0790 Mobile. 994 190 404*

*e-mail: [larteaga@estudioarteaga.com](mailto:larteaga@estudioarteaga.com)*

*web: [www.estudioarteaga.com](http://www.estudioarteaga.com)*

**CERTIFIED TRANSLATION**

**TC N° 0767-2019**

**COMPLIANCE POLICY**



  
Liz Arteaga Ulfe  
CTP N° 0353

N° 0360790

Valor 3.50 Soles

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## 1. OBJECTIVE

Generating a Culture of compliance in officials, employees and interested third parties of **DIAGNÓSTICO UAL S.A.C.** understood as the extension of integrity in all manifestations of its business activity, encompassing the performance of mandatory requirements and commitments voluntarily undertaken with interested third parties, avoiding personal injury, economic loss, reputational damage and legal responsibilities.

## 2. REACH

This policy applies to all officials (Shareholders, Managers), employees and personnel who perform activities on behalf of **DIAGNÓSTICO UAL S.A.C.** and interested third parties.

## 3. SCOPE OF APPLICATION

It comprises all the activities conducted by **DIAGNÓSTICO UAL S.A.C.** within the framework of its corporate purpose.

## 4. RESPONSIBILITY

**Governing Body:** It is responsible for the approval of this Policy.

**General Management:** They are responsible for establishing and communicating the guidelines of this policy internally and externally to the members of the organization and interested third parties.

**Compliance Officer:** He/she is responsible for overseeing the application of this policy by the members of the organization and interested third parties.

**Human Resources,** It is responsible for strengthening awareness in company personnel about the provisions of this Policy.

## 5. DEFINITIONS

**Compliance commitment:** Requirement that an organization chooses to meet.

**Culture of compliance:** Values, ethics and beliefs that exist in an organization and that interact with the organization's structures and control systems to produce behavioral rules that lead to compliance results.



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**Compliance:** Complying with all compliance commitments of an organization.

**Corporate governance:** It is the set of processes, customs, policies, laws and institutions that affect how a company (corporation) is managed, administered or controlled. It also includes the relationships between the many agents involved in them (from ownership to management, external controllers, creditors, investors, customers, suppliers, employees and the environment and the entire company).

## 6. POLICY

**DIAGNÓSTICO UAL S.A.C.** undertakes to:

1. Perform all its activities under the commitment of strict compliance with the legislation, the provisions of the Code of Ethics and those commitments that it voluntarily enters into.
2. Promote a Culture of Compliance among all its officials, employees and interested third parties through the application of good practices, ethical values and strict regulatory compliance.
3. Regulate the operation of the Governing Body so that its management favors compliance with the guidelines of this policy.
4. Strengthen the measures implemented for the preparation and presentation of financial information in full, as well as adequate compliance with current legislation and regulations signed in accounting matters.
5. Provide the regulatory framework to officials and employees in order to ensure appropriate practices and behaviors that are appropriate to the applicable legislation and regulations in terms of Free Competition.
6. Establish the necessary measures to comply with the current legislation and regulations signed in the matter of Protection of Personal Data, ensuring the principles of privacy, quality and truthfulness in the processing of the data.
7. Establish the appropriate means for officials and employees to prevent, and where appropriate, report, any activity related to legislation and regulations regarding corruption and fraud.
8. Provide the necessary measures to prevent, and where appropriate, report behaviors associated with money-laundering and Financing of Terrorism.

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9. Maintain a communication channel to inform and report any act considered as illicit or inappropriate, giving it the necessary guarantees for its excellence and reminding employees about its existence and obligation to use in these incidents.
10. Set goals with achievable objectives in all its activities, to guarantee high quality standards in the products and services offered, as well as the efficiency of its processes.
11. Promote, throughout its activities and productive processes, an effective protection of the Environment, through responsible practices such as the adequate disposal of generated waste and the management and control of resource consumption.
12. Allocate the necessary resources to fulfill the objective and commitment to provide a safe and healthy work environment, promoting the principles of continuous improvement in the management of Occupational Health and Safety.
13. Ensure the existence and compliance with the internal labor regulations, which sanctions behavior contrary to what is established in the Code of Conduct, ensuring its equitable, proportional and fair application.
14. Keep informed and trained personnel who is linked to the organization in prevention of bribery, money-laundering and financing of terrorist inside and outside the company.
15. Integrate compliance policy with other policies, risk management, internal auditing and organizational processes.
16. Designate the compliance function, who will be the person responsible for managing compliance within the organization. The designated compliance officer will have independence, that is, he/she will not be involved in the organization's activities exposed to the risk of bribery, money-laundering and financing of terrorist. The governing body and the General Management of **DIAGNÓSTICO UAL S.A.C.** will grant the compliance officer sufficient authority to effectively develop the assigned responsibilities.
17. Manage its relationships with internal or external interested third parties based on the principles of governance, respect for legality, competitiveness and corporate values of transparency and honesty.

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Noncompliance with the Compliance Policy of **DIAGNÓSTICO UAL S.A.C.** will constitute a serious breach of the employment contract and internal labor regulations, which will entail the application of sanctions that may imply the termination of the employment relationship. Additionally, it may involve fines, administrative or criminal sanctions. Lack of awareness or inadequate understanding of this policy does not entitle its recipients to breach it.

(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 04 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 23<sup>rd</sup> day of August, 2019.



  
Liz Arteaga Ulfe  
CTP N° 0353