	<p align="center">PEDREGAL MANAGEMENT SYSTEM</p>	<p align="center">CODE RA2-PRE-002</p>
<p align="center">PREVENTION:</p>	<p align="center">CODE OF ETHICS AND MANAGEMENT BEHAVIOR</p>	<p align="center">REGULATIONS Version: v.5 Page 1 of 19</p>

I. PURPOSES

The Code of Ethics and Business Conduct (hereinafter, the "Code) of El Pedregal S.A. (hereinafter, indistinctly "Pedregal" or the "Company"), establishes the rules of conduct that are expected to be respected and complied with by our employees, promoting integrity and transparency; helping us make ethical decisions, showing us how to identify potential misconduct and promote standards of exemplary conduct for our employees inside and outside the Company and in our relationships with third parties.

Our Code will help us protect Pedregal's earned reputation among employees, clients, suppliers and other interested parties.

II. LEGAL BASIS

- RA2-GGH-001: Internal Work Regulations
- Universal Declaration of Human Rights
- International Letter of Human Rights
- The International Labor Organization (ILO) Declaration related to Principles and Labor's Fundamental rights.

III. SCOPE AND RESPONSIBILITIES


It is applied for all the employees working in Pedregal, independently, their status, to wit: trainees, workers, employees, or executives.

Each employee is obliged to comply with and ensure compliance of the rules and/or guidelines of the Code, which must be appropriately applied to our daily activities, and it is a goal to go beyond not only for fulfilling the law and our policies, helping to guide our conduct and decision making, to work in a fair and reliable manner.

Also, it is expected that all third party establishing a commercial relationship with Pedregal, shall respect our values and show a high-level standard of ethical conduct, for such purpose we shall make best efforts for communicating and enforcing our expectations related to our Code.

Our Code is not intended to be the compilation of all the rules of conduct and cannot cover all situations, which is why our Managements have the responsibility of ensuring that these guidelines are followed throughout all of Pedregal and that they are framed within the principles of good overall management, as well as in accordance with current laws and regulations and in scenarios not contemplated in our Code, good faith and current legislation must prevail.

Our Ethics and Business Conduct Committee (hereinafter, the "Committee) is compounded by several areas of the Company in order to avoid conflicts of interest regarding complaints that may be submitted.

	<p align="center">PEDREGAL MANAGEMENT SYSTEM</p>	<p align="center">CODE RA2-PRE-002</p>
<p align="center">PREVENTION:</p>	<p align="center">CODE OF ETHICS AND MANAGEMENT BEHAVIOR</p>	<p align="center">REGULATIONS Version: v.5 Page 2 of 19</p>

The designated and appointed people of the Ethics and Business Conduct Committee will be in charge of forming each specific Committee according to the nature of the complaint in order to seek objectivity, impartiality and independence for taking actions.

The President will be the same for all Committees, taking into account that she also holds the position of "Officer in charge of the Prevention Model focused on risks of corruption, money laundering and financing of terrorism."

The Committee must ensure compliance with the Code and carry out an investigation process in the event of any non-compliance.

The Human Resource's Management, Labor Relations Deputy Management and, if applicable, the Managements of each ranch will oversee the administrative penalties as a result of the investigation of each complaint.

IV. DEFINITIONS

1. **Workplace Harassment:** Practice exercised in the workplace and consisting of any systematic and constant attitude or behavior of a person or group towards another in the workplace that threatens their dignity and psychological, physical and/or emotional integrity, degrading their work environment and attempting against their employment position creating an unpleasant or hostile environment for the affected person. Workplace harassment can be downward (from bosses to subordinates), horizontal (between coworkers) or upward (from subordinate to bosses).
2. **Sexual Harassment:** It is any behavior, verbal or physical, of a sexual nature that has the purpose or has the effect of violating the dignity of a person, when an intimidating, degrading or offensive environment is created.
3. **Occupational Health:** Multidisciplinary science, which aims to promote and maintain the highest possible degree of physical, mental and social well-being of employees in their workplaces; prevent any damage due to illness or accident caused to health due to employment conditions; protect them in their employment against risks resulting from the presence of agents harmful to their health.
4. **Confidentiality:** It is what is done or said in the confidence that the confidentiality of what was done or said will be maintained.
5. **Conflicts of Interest:** It is referred to those situations in which personal private interest - professional relationships or personal economics' interests - interfere or can be understood to interfere with the performance of their job duties.
6. **Dishonesty:** Lack of veracity in words or in the acts.
7. **Discrimination:** Any kind of declaration or action based on race, origin, color, age, sexual orientation, genre, incapacity, pregnancy, maternity, civil status, civil union, cultural, political or religion beliefs.

Pedregal <i>the fruit company</i>	PEDREGAL MANAGEMENT SYSTEM	CODE RA2-PRE-002
PREVENTION:	CODE OF ETHICS AND MANAGEMENT BEHAVIOR	REGULATIONS Version: v.5 Page 3 of 19

8. **Money laundering:** Any transaction or series of transactions by which the true origin of illicit fund is covered or for appearing that such funds have been obtained in legal activities.

9. **Attacks against archaeological monuments:** Whoever settles, preys or who, without authorization, explores, excavates or removes pre-Hispanic archaeological monuments or paleontological areas declared as paleontological heritage of Peru, regardless of the real right held over the land where it is located, if it is known the character of cultural heritage or paleontological heritage of Peru

10. **Terrorism:** Whoever causes, creates or maintains a state of anxiety, alarm or fear in the population or in a sector of it, carries out acts against life, body, health, personal freedom and security or against property, against security of public buildings, roads or media or transportation of any kind, power or transmission towers, motor facilities or any other good or service, using weapons, explosive materials or devices or any other means capable of causing havoc or serious disturbance to public order or affect international relations or the security of society and the State.

Includes all collaboration with terrorism, affiliation with terrorist organizations, instigation to commit the crime of terrorism, recruitment of people, conspiracy to commit the crime of terrorism and obstruction of justice.

11. **Financing of Terrorism:** It is consisted of collecting licit or illicit funds to finance terrorists, terrorist organizations, extremist organizations or terrorist acts.


12. **Refusal, delay and falsehood in the provision of information:** Whoever refuses or delays providing the competent authority with the requested information or deliberately provides the information in an inaccurate manner or provides false information.

13. **Ethical Line:** It is a claim system created for preventing, identifying, and dissuading irregular and/or fraudulent conducts, with a 24/7 availability, 365 days.

14. **Reprisal:** Response of punishment or revenge for some aggression or offense. Prohibited forms of retaliation include, but are not limited to, offensive statements or actions, harassment, discrimination, dismissal, suspension of employment contract, threats, blacklisting, as well as denial of benefits.

15. **Environmental care:** Represents all those behaviors which living beings shall take for caring the nature. The purpose is to make an environment with more opportunities and more benefits satisfying the life of all generations.

16. **Influence trafficking:** To influence into an official or public authority through a situation of prevailing for obtaining an economic benefit through a Court Order.

	<p align="center">PEDREGAL MANAGEMENT SYSTEM</p>	<p align="center">CODE RA2-PRE-002</p>
<p align="center">PREVENTION:</p>	<p align="center">CODE OF ETHICS AND MANAGEMENT BEHAVIOR</p>	<p align="center">REGULATIONS Version: v.5 Page 4 of 19</p>

17. Gifts, Bribery and illegal commissions: Giving or receiving gifts or other benefits as a source of high risk in terms of corruption. It may mean any sum of money, fee, commission, credit, gift, gratuity, object of value or compensation of any kind that is given, either directly or indirectly, to any employee, supplier, employee of the supplier for the purpose of obtaining or improperly rewarding favorable treatment in connection with a contract or bargaining agreement.


18. Robbery or Theft: Unauthorized suppression or taken of supplies, furniture, accessories, products, money in cash, goods, or other tangible assets, appropriate someone else's properties, by using or not force or intimidation with profit motive in mind.

19. Human Trafficking: When, using violence, threat or another form of recruitment, a person is retained for purposes of exploitation, inside or outside the Country.

V. PROCEDURE

1. GENERAL CONSIDERATIONS

- A.** Pedregal has put special effort to be recognized for its impeccable experience, social responsibility, beliefs and commitment with the environment and community; therefore, all employees have to obligation to project a positive image and refrain from work or personal behavior that could put their image and good name of Pedregal at risk.
- B.** A Company recognized by its reputation is a desirable company for cooperating, a place where more talented person would like to work, someone who clients may trust, and it is observed as a guaranteed project.
- C.** Good reputation is one of the most valued assets a company may have because it is related to its capacity for satisfying expectations and transmitting confidence. For such purposes, it is required to manage strategically, coordinately and systematically business reputation.
- D.** Each employee shall:
 - a. To know, respect, and fulfill the provisions of Code and additional guidelines applied to our position.
 - b. To fulfill with law, this Code and all policies.
 - c. To request orientation, immediately, in case of doubt and accept a guide when it is required for “doing the right thing”, being responsible of our decisions.
 - d. To speak without reservations if we believe our code or policies are not fulfilled in any way.
 - e. To report, timely, about any fact against good manners and provisions established in the Code according to the proceeding therein established.
 - f. To participate in all trainings.

	<p align="center">PEDREGAL MANAGEMENT SYSTEM</p>	<p align="center">CODE RA2-PRE-002</p>
<p align="center">PREVENTION:</p>	<p align="center">CODE OF ETHICS AND MANAGEMENT BEHAVIOR</p>	<p align="center">REGULATIONS Version: v.5 Page 5 of 19</p>

g. To cooperate, be an open and sincere person in any investigation, auditing process, and other revisions including those performed by third parties or tax authorities.

h. To act following basic basis of integrity, responsibility, team spirit and excellence.

E. If you have workers in charge, you have additional responsibilities:

- a. To guide with integrity and compromise.
- b. To be a positive model and support your team.
- c. To ensure that team members, inclusive all those who recently have entered Pedregal, understand principles and expectations of the Code, law and policies applied to their jobs.
- d. To create a respectful, open and inclusive environment.
- e. To encourage your team to speak up and seek guidance when they have questions or concerns.
- f. To look for help, if you are not sure about the focus, or the best decisions to be taken.

F. Failure to comply with the obligations contained in the Code, its policies and procedures, in accordance with the scope of RA2-GGH-001: **Internal Labor Regulations**, as well as current labor regulations, may give rise to disciplinary measures including written reprimand, suspension, dismissal or non-renewal of employment contract, depending on the nature and severity of the fault.

2. MATTERS COVERED THE CODE OF ETHICS


A. LAW COMPLIANCE

All Company's employees, independently their status of apprentices, workers, employees or executives shall safeguard the compliance of regulations, policies and legal provisions, internal, national or international applied to the Pedregal's activities.

As an organization, we have a prevention model based in risks and a structure suitable of supervisions helping us to have a prevention and control environment.

All of us are responsible for fulfilling the law, both in and out our workplace. We must perform our labor diligently and know, spread and keep updated the guidelines related to our work.

In cases the law interpretation and applied guidelines are confused, employees can consult, without limitation, to our internal legal area which has access to external legal advisors of Pedregal.

	<p align="center">PEDREGAL MANAGEMENT SYSTEM</p>	<p align="center">CODE RA2-PRE-002</p>
<p align="center">PREVENTION:</p>	<p align="center">CODE OF ETHICS AND MANAGEMENT BEHAVIOR</p>	<p align="center">REGULATIONS Version: v.5 Page 6 of 19</p>

B. SPREADING OF INTERNAL REGULATIONS

Pedregal agrees to provide a timely, consistent and real diffusion of the Code to its employees. It is expected that all the Pedregal's employees fulfill all provisions contained in it.

The Committee shall be the only entity authorized for issuing announces or statements on the Pedregal's behalf about facts affecting it.

C. CONFIDENTIALITY AND HANDLING OF INFORMATION

The information is related to each aspect of our job. To protect it is an important responsibility for each of us.


During the performance of our duties and commercial activities with the Pedregal, we could keep in touch with confidential or privileged information, which it shall not be at public disposal.

Confidential information belongs to the Pedregal, and it may include without restrictions nor limitation:

- Details related to the Pedregal, clients, prices, markets, equipment, sales, profits, report of internal figure, among others.
- Information related to investigations and development.
- Information related to the Company's know how¹.
- Technical information related to our products, services and processes.
- Information related to our marketing and services' strategies.
- Details related to current or possible fusions, acquisitions or sales of assets.
- Information related to employees and human resources, among others.
- Agreements.
- Prototypes and management's models.
- Developing products.
- Industrial secrets.

We must prevent the spreading or due or non-authorized access to such confidential information for third parties. These obligations shall remain in force inclusive after the termination of our labor relationship with the Pedregal.

¹ Group of technical and administrative essential knowledge for carrying out commercial process of Pedregal and which are not protected under a patent.

	<p align="center">PEDREGAL MANAGEMENT SYSTEM</p>	<p align="center">CODE RA2-PRE-002</p>
<p align="center">PREVENTION:</p>	<p align="center">CODE OF ETHICS AND MANAGEMENT BEHAVIOR</p>	<p align="center">REGULATIONS Version: v.5 Page 7 of 19</p>

All the Pedregal’s employees shall assure to understand what is the public or non-reserved information which could be shared with third parties, if there is not involved any risk of damage for Pedregal and previous consultation with the next hierarchical authority.

By no means, confidential information shall be used for the own benefit, for other employees, relatives or third parties.

Directors, Managers and Employees which duties require to have access to confidential information are the only authorized to access to it, and they are obliged to facilitate the Area of the Pedregal’s system to perform the respective back up², as a procedure of the custody of information.

All Pedregal’s employees’ which functions are associated to the creation, entering, modification, erasing, consultation and visualization of information are engaged to be honest with the respective handling of information, entering true data, results of the associated procedure activities, still in conditions presuming unfavorable for its performance evaluation; not access to direct or technological means to information which is not related to their labors.

In the same manner, not to access to the information systems to affect the regular flow of information or local or remote security of such systems (not to hackers or security offenders).

Manages all information with careful and take measures before spreading to any person, in or out the Pedregal. You shall share information only which such entitled and authorized persons. Do not publish Pedregal's information in public forums or in social networks.

Always keep in secret your passwords and not share them with coworkers or other persons, block your monitor and any other provision, as a tablet, keep sure your mobile phone and be, particularly, careful in public places, protect with passwords such very confidential documents, keep confidential documents and portable computers into a safe place, especially from one day to the other day.

D. COMMERCIAL RELATIONSHIPS: COMPETITION AND FAIR TREATMENT


Client's relationships and providers are essential for the Pedregal’s continuous success, so we develop our commercial relationship under the premise of respect, justice and high ethical standard.

Employees shall conduct themselves with honesty, integrity and respect in its relationships with competitors, clients and providers, and guarantee the confidentiality of all information granted by them, unless otherwise required by law or the Client and the provider have given their authorization.

We expect our providers and clients sharing our ethical guidelines.

We compete by using high ethical standards and respect, strictly, laws regulating the free market.

² Copy of one or more computer files for preventing the losing of information.

	<p align="center">PEDREGAL MANAGEMENT SYSTEM</p>	<p align="center">CODE RA2-PRE-002</p>
<p align="center">PREVENTION:</p>	<p align="center">CODE OF ETHICS AND MANAGEMENT BEHAVIOR</p>	<p align="center">REGULATIONS Version: v.5 Page 8 of 19</p>

E. PROTECTION OF PERSONAL DATA

We fulfill with laws and guidelines applied to the protection of personal data.

Pedregal shall appoint such authorized persons for compilation and keeping of employees’ personal data, of our clients and our providers, guaranteeing the data protection’s rights, according to those ordered in the Law No. 29733 on Personal Data’s Protection and its Regulations, Executive Decree No. 003-2013-JUS, through its suitable treatment into a framework of respect to the fundamental rights therein noticed; so, all provided information, shall be compiled into a Personal Data Bank which for this purposes it shall be implemented and will be in charge of the Pedregal who adopts legal, technical, organized and security measures required for avoiding losing, bad use, alteration, non-authorized access and theft of personal data, as well as to keep confidentiality with respect to such personal data; unless it will be removed for an Administrative body or requirement of the National Bureau of Justice in charge of the Ministry of Justice.

Employee’s personal data will be provided to third parties alien to the Pedregal, exclusively in such cases in which the Employees have granted permissions for statistical, and performance matters, or in those case requested by law.

Our employees, suppliers, commercial partners and clients shall manage personal data which they have accessing, securely and confidentially, within such established in the contracts.

F. ATTACKS AGAINST ARCHEOLOGICAL MONUMENTS ARE NOT ALLOWED


In the Pedregal is not allowed or accepted the depredation of pre-Hispanic archaeological monuments or paleontology zones declared as a Peruvian paleontology heritage site.

We instill and promote in our employees caring to archaeological monuments and to report, duly and timely, in cases of we found any archaeological finding in any of our sites.

G. ENVIRONMENTAL CARE

Pedregal agrees to protect the environment and to perform its commercial activities responsibly and sustainable for such purpose. In doing so, we have the support and participation of our employees and efficient leadership of our directives. All of us should respect and fulfill with laws, guidelines and practices adopted by the Pedregal in relation to the environmental protection.

As an Agro-industrial company, our commitment to the conservation and good use of natural resources is a priority, including water, energy, soils and air. Good use of water and energy, reduction of residues and wastes, reduction of atmospheric emissions, recycling, minimizing of impact of its products and packing and the indicator of carbon footprint (allowing to reflect the full of greenhouse effect issued directly or indirectly by our process, in order to reduce it), is a Company’s priority.

	<p align="center">PEDREGAL MANAGEMENT SYSTEM</p>	<p align="center">CODE RA2-PRE-002</p>
<p align="center">PREVENTION:</p>	<p align="center">CODE OF ETHICS AND MANAGEMENT BEHAVIOR</p>	<p align="center">REGULATIONS Version: v.5 Page 9 of 19</p>

Also, we instill to our employees in order to look for opportunities for reducing wastes and the use of energy, for recycling, turn off apparatus when they are not been using, promote the use of supplies and ecological material and reduce job traveling, whenever is possible.

H. REFUSAL, DELAY AND FALSENESS IN PROVIDING INFORMATION:

It is not allowed the refusal or delay in providing information to the authority, or deliberately provide information in an inaccurate manner or to provide false information.

I. CONFLICT OF INTEREST

Conflict of interest are referred to those situations in which the individual's sense and the integrity of an action tends to be undue influenced for an economic or personal interest.


The conflict could be:

- Potential: There is not a conflict of interests at the time, but it could appear in the future under specific circumstances.
- Real: When an interest partially influences the performance or interested preferences of the activities of a Pedregal worker.

All the Pedregal’s employees shall avoid situations that could put them in this kind of conflicts and in such cases, must know how to act and know legal and ethical implications of their acts.

The Code cannot cover all possible conflict of interests that could happen. Some frequent situations of conflict of interests - without this list be closed - are as follows:

- To make decisions or perform transactions with client, suppliers, or competitors with purposes of generating any personal benefit, direct or indirect, replacing what is better for the Company.
- To perform, while we are employees, investments granting powers us of managing in supplier companies, clients, competitors or to whom we have a relationship, except when there exists the express approval of the General Management's Office.
- To use assets, staffs and/or companies’ resources for personal benefit.
- To develop other activities interfering or entering into conflict, direct or indirectly with our activities or the Company's duties.
- To hire personnel who have relatives within the company up to the fourth degree of consanguinity, conjugal or similar, or who maintain a parallel employment relationship with the company, within the same area in which they must interact in a relationship of subordination or dependency. and even in any other area of the company if this could generate a conflict of interest.

	<p align="center">PEDREGAL MANAGEMENT SYSTEM</p>	<p align="center">CODE RA2-PRE-002</p>
<p align="center">PREVENTION:</p>	<p align="center">CODE OF ETHICS AND MANAGEMENT BEHAVIOR</p>	<p align="center">REGULATIONS Version: v.5 Page 10 of 19</p>

- To Manage or have a decision-making position in commercial relationships with clients or contracting suppliers, with whom direct relatives of our collaborators work (spouse or cohabitant, children, siblings and parents).
- To provide services within or out the labor schedule to the Company's competitors.

We must act with transparency and ethics reporting any conflict's situation, real or potential, to our immediate head and declaring it in the FA2-PRE-002 DJ on conflict of interests or through channels of ethical line.

J. POLITICAL ACTIVITIES AND CONTRIBUTIONS

We do not make political contributions.

We respect political thinking which each of our shareholders, directors, employees may exert, privately, however, we do not participate in political activities, and we prohibit propaganda campaign within our workplace.

K. GIFTS AND INVITATIONS

Corporate gifts and business invitations are customary courtesies designed for promoting good will among business partners, which due to their smaller amount can be given through invitations, personal discounts, among others.

It is not prohibited to offer or accept the gifts or corporate invitations detailed above if they are of reasonable value, which must comply with our Code and company policies.

L. DONATIONS

As a part of our sustainability strategy, at Pedregal we perform initiative for social development and donations that help improve the quality of life in the communities surrounding our operations. Through our donations, we do not expect to exert undue influence or hide other services provided, on the contrary, we look to contribute to the community.

All our donations are made in good faith, they fulfill laws in force and internal policies, it has been evaluated and approved by the respective jurisdictions (see policies of donations) and they are registered adequately into the Company's accounting.

M. POLICY REGARDING BRIBERY SITUATIONS

Bribery and corruption, in all their forms, are unacceptable and illegal. They also harm competition and markets, increase costs and compromise the trust of our customers and partners.

Pedregal <i>the fruit company</i>	PEDREGAL MANAGEMENT SYSTEM	CODE RA2-PRE-002
PREVENTION:	CODE OF ETHICS AND MANAGEMENT BEHAVIOR	REGULATIONS Version: v.5 Page 11 of 19

Pedregal is committed to conducting its business activities with integrity and rigorously prohibits corruption; we do not tolerate bribery or corruption in any of its forms. We comply with anti-bribery and anti-corruption laws wherever we do business by never giving or accepting anything of value in exchange for preferential treatment or to influence an action. We expect that everyone who works, with or for us, takes the same zero-tolerance approach. Likewise, all our contracts with suppliers, contractors and service providers contain anti-corruption clauses.

We must not, directly or indirectly, accept, offer, promise, grant or authorize the delivery of a bribe, undue commission, payment or any other element that may be interpreted as such (gifts of representative value, entertainment, employment, contracts or benefits of any kind) to a third party in order to influence their actions or decisions, or prevent them from acting, with the intention of obtaining contracts or an improper advantage.

Please understand that a bribery may be something else that a payment offered for undue influence in a decision: it could be a gift, favor, loan, job or even an entertainment or travel offer.

If a member of Pedregal becomes aware of any activity of the type described above, they must inform their immediate boss/Manager and/or it must be reported through the ethics line channels.

N. INFLUENCE TRAFFICKING


It is strictly prohibited for any person who has a relationship with Pedregal to use influence, real or simulated, to receive, make, give or promise for themselves or a third party, a donation, promise or benefit in order to intercede with an official public that has to know or knows a judicial or administrative case.

O. MONEY LAUNDERING

Any transaction or series of transactions by which the true origin of illicit fund is covered or for appearing that such funds have been obtained in legal activities. Such above-mentioned may provoke the hidden of origin of assets having an illegal or criminal origin, being those in properties, money or other assets, within legitimate commercial activities.

Our contracts with suppliers, service providers and third parties contain clauses on anti-corruption, money laundering and crimes related to terrorism.

Likewise, in order to guarantee that the operations carried out do not lend themselves to illegal organizations to conceal the proceeds of their criminal activities, or use resources to commit crimes, Pedregal will put into practice the measures required by current law and all its activities will be carried out under the strictest ethical principles and with full observance of the laws and regulatory standards related to the prevention of money laundering; Pedregal will also provide all the information that at some point may be required by one of the parties to establish the illegality of the transactions, as well as that which is required for the collaboration of competent authorities.

	<p align="center">PEDREGAL MANAGEMENT SYSTEM</p>	<p align="center">CODE RA2-PRE-002</p>
<p align="center">PREVENTION:</p>	<p align="center">CODE OF ETHICS AND MANAGEMENT BEHAVIOR</p>	<p align="center">REGULATIONS Version: v.5 Page 12 of 19</p>

P. CRIMES RELATED TO TERRORISM

It is strictly prohibited all collaboration with terrorism, affiliation to terrorist organizations, instigation to the perpetration of terrorism crimes, recruitment of persons, conspiracy to terrorism acts, obstruction of the justice and financing of terrorism and it is regulated in the Law Decree No. 25475.

The financing of Terrorism is aimed to, by using any mean, directly or indirectly, within or without the national territory, voluntarily, provide, give or collect funds, money, financial or economical resources or services related, or for any nature, licit or illicit, in order to perform any crime according to law, any terrorist act defined in treaties which Peru forms part, performance of purposes or assure the existence of a terrorist group or individual terrorists.

Any crime related with terrorism is not acceptable for standards of conduct established in Pedregal and as Pedregal's collaborators we have the obligation to report real or potential situations about such crime.

Q. ROBBERY OR THEFT

Unauthorized suppression or taken of supplies, furniture, accessories, products, money in cash, goods, or other tangible assets, appropriate someone else's properties, by using or not force or intimidation with profit motive in mind.

R. SECURITY AND OCCUPATIONAL HEALTH


We are all responsible for making the Pedregal a very safe place for working.

Pedregal recognizes the importance about the staff's security within our facilities, for such purpose it is promoted its participation in the engagement and participation in the bettering continual improvement process in favor of the prevention of labor risks.

Our employee' security is the most important in each and all Pedregal's projects; so, we agree to offer a healthy, sure and productive job environment in all our offices and headquarters.

The Pedregal's employees shall fulfill all regulations and policies in force about security and health in the job, keeping - and bettering, constantly, - the Security and Health's System Management aimed to protect the employees, introduce controls and eliminate risks related to its activities.

It is Pedregal's policy to perform continuous practices of Occupational Health and Security, for such purposes we have the Committee of Occupational Health and Security duly implemented, being responsible for fulfilling the Company's security measures.

	<p align="center">PEDREGAL MANAGEMENT SYSTEM</p>	<p align="center">CODE RA2-PRE-002</p>
<p align="center">PREVENTION:</p>	<p align="center">CODE OF ETHICS AND MANAGEMENT BEHAVIOR</p>	<p align="center">REGULATIONS Version: v.5 Page 13 of 19</p>

S. NON-DISCRIMINATION OR HARASSMENT

In Pedregal we respect and work together for promoting a free harassment working place. Any kind of harassment or abuse is not allowed. It is herein included those actions which could be considered as offensives, hostiles or discriminating, either against an employee, coworker, client, supplier or a third party.

The discrimination is not allowed under any way related to the employment for reasons of race, ethnic origin, cultural, color, religion, sex, nationality, civil status, sexual orientation, incapacity, political direction, unionization or age.

It is a customary practice that the Company shall keep an environment of equality in the job in and out the Company, allowing instilling all involved parties to a fair treatment and prohibit any distinction, exclusion or preference based on race, color, sex, religion, civil status, political direction, incapacity or social, ethnic or unionization origin with the intention to annul or alter the equality of labor opportunities before the law.

Pedregal accepts the participation of employees in the selection process of its representatives in committees against sexual and labor harassment at each level and scope, without any interference, providing chances and supporting the management and election. It is expected that Pedregal's employees make reports before any member of committees, management's office or by using our communication channels, the harassment or another inappropriate conduct, as soon as possible.

T. HUMAN RIGHTS, FORCED LABOR, HUMAN TRAFFICKING AND CHILD LABOR


We are respectful of the human rights recognized in the World Declaration of Human Rights, the Global Compact and other domestic and international guidelines.

We prohibit child labor and refuse any kind of forced labor or degrading conditions.

We respect the right to freedom of association or non-association and collective negotiation of our employees.

We do not hire suppliers or production facilities, where there is any kind of exploitation or labor under conditions that violate human rights.

We seek to ensure that at Pedregal there is no discrimination in the selection, training, development, evaluation and retention processes of personnel for reasons of cultural diversity, gender, sexual orientation, race, creed, religion, physical capacity or social condition.

	PEDREGAL MANAGEMENT SYSTEM	CODE RA2-PRE-002
PREVENTION:	CODE OF ETHICS AND MANAGEMENT BEHAVIOR	REGULATIONS Version: v.5 Page 14 of 19

At Pedregal we seek to create an inclusive environment, respecting and supporting cultural diversity, gender, sexual orientation, race, creed, religion, physical capacity or social status of our employees. We seek to create a company in which everyone feels integrated, respected, valued and effectively has the same development opportunities.

Every opportunity at Pedregal is based on the talent and merit of our employees in connection with our values and behaviors. We provide our employees with salaries and benefits based on meritocracy and/or performance evaluation.

Pedregal always seeks to train and provide development opportunities to all its employees so that they can improve their knowledge and skills to perform well in their positions, as well as to acquire knowledge and skills that can prepare them to assume higher levels of responsibility in accordance with their performance and potential development. It is the responsibility of each individual to develop, perform and progress in their work.

Likewise, our commitment to society regarding the fight against human trafficking is a priority issue for all company employees and for those companies performing commercial exchanges with us.

It is not accepted that our collaborators (employees, suppliers, and/or clients) commit the crime of human trafficking stipulated in the Peruvian Criminal Code and in several international regulations.


All employees must know our policy against human trafficking (PoA2-PRE-005) and Pedregal employees are obliged to participate in the trainings that Pedregal, organizes on this topic. Forced labor, which means any work or service performed involuntarily under the threat of physical or other punishment, is not permitted.

The Pedregal's policy is not to hire minors, directly or indirectly through its subcontractors, nor to accept work from minors that contravenes national legislation; nor does it hire or use forced labor as a means, under any form.

Pedregal will comply with the minimum age limit to work in its facilities, provided for in national laws or by the International Labor Organization on the minimum age for admission to employment, whichever is higher.

Minors labor affects children fundamental rights, such as education, health, welfare and protection against exploitation.

It is Pedregal's policy to protect children against economic exploitation and against the performance of any forced labor which could be dangerous or affect the education access, or attempt the physical, mental, moral, social and health development.

	<p align="center">PEDREGAL MANAGEMENT SYSTEM</p>	<p align="center">CODE RA2-PRE-002</p>
<p align="center">PREVENTION:</p>	<p align="center">CODE OF ETHICS AND MANAGEMENT BEHAVIOR</p>	<p align="center">REGULATIONS Version: v.5 Page 15 of 19</p>

3. ETHICAL LINE:

For promoting a transparent organizational culture, Pedregal provides the ethical line with the following channel for a fluid communication:

A. WEBSITE:

- El Pedregal makes it easy to enter complaints directly on the website: www.lineaeticapedregal.com
- This page contains answers and guidelines for entering claims easily and practically.
- Available 24/7, the 365 days of the year.
- The report shall be answered by the ethical line's administrator.
- No username or password is required to enter.
- A single correlative number shall be registered for processing and following the report.

B. ELECTRONIC MAIL


- This email shall permit you send your report through: lineaetica@elpedregalsa.com
- It is available for any moment you consider advisable.
- The message will be read by the Ethical line's administrator.

C. CELL PHONE OR WHATSAPP

- If you desire to communicate with the ethical Line's administrator for guiding you in the process to make a report dial: 922403778.
- Also, you may send a report through WhatsApp by using messages, audios, photos and attached files.
- This channel is available in the business hour (7:00am to 4:00pm), office days (Monday to Friday).

D. PERSONAL INTERVIEW

- If you desire to be personally attended for filing a complaint, you can go to:
Lima Headquarters: Jr.Monte Rey 355, Piso 6, Surco, Lima –Perú
Piura Headquarters: Fundo Terela S/N Caserío de Terela, Castilla
Ica Headquarters: Fundo Yaurilla S/N Yaurilla, Los Aquijes
Trujillo Headquarters: Calle24 de Junio Nro. S/N(S/N Pueblo Chiquitoy) Ascope, La Libertad.

	<p align="center">PEDREGAL MANAGEMENT SYSTEM</p>	<p align="center">CODE RA2-PRE-002</p>
<p align="center">PREVENTION:</p>	<p align="center">CODE OF ETHICS AND MANAGEMENT BEHAVIOR</p>	<p align="center">REGULATIONS Version: v.5 Page 16 of 19</p>

- Ask for any member of the Committee mentioned in the Exhibit B of this Code for making an appointment.
- Available in office days, Monday to Friday, in business hours (7:00am to 4:00pm) or out of office, previous appointment.

VI. PRECISIONS AND RECOMMENDATIONS

- If any employee is informed of a potential infringement or suspect of infringement of the code, it is obliged to report it through the ethical line's channels.
- Employees may report any worry or claim related with internal controls, spreading, frauds, bribery and business practices opposite to the code.
- Any person may file, **confidentially and anonymously**, a report without any kind of reprisals, through our channels of complaint of our ethical line.


1. HANDLING OF REPORTS

After receiving a report or complaint, through any of our Ethics Line reporting channels, the President of the Committee will acknowledge receipt of the report to the person who presented it. The complaint will then be reviewed by the President of the Committee for processing. Confidentiality will be maintained throughout the investigation process. If the complainant does not identify himself in his complaint and the information provided is not sufficient, Pedregal must investigate the incident to resolve it. Anonymous complaints must contain sufficient detail and information so that the investigation can be carried out.

The Committee will take appropriate and immediately applicable corrective actions that may apply. Likewise, when possible and considered appropriate by the Committee, the person who filed the complaint will receive notice of any corrective action taken.

2. WITHOUT REPRISALS

Any member of Pedregal who has been found responsible for retaliating against a person who has made known, in good faith, any concern, complaint and report, may be subject to disciplinary action, up to and including the labor termination or the termination of any business relationship. If any person believes that he or she has been subject to such reprisals, that person is urged to report this situation to the President or to any member of the Committee.

	<p align="center">PEDREGAL MANAGEMENT SYSTEM</p>	<p align="center">CODE RA2-PRE-002</p>
<p align="center">PREVENTION:</p>	<p align="center">CODE OF ETHICS AND MANAGEMENT BEHAVIOR</p>	<p align="center">REGULATIONS Version: v.5 Page 17 of 19</p>

3. TRANSPARENCY IN RELATIONSHIPS AND THE RIGHT TO DISAGREE

- Each of the members of Pedregal is obliged to interact in a positive way, meaning the absence of ulterior motives, manipulation of information or people, and induction into error. Good faith will govern Pedregal's relations with employees, shareholders, directors, clients, suppliers, the State and competitors.
- The controversy in Pedregal is welcomed and respected. The members of this company can express their disagreements with actions that they consider contrary to their principles of equity, human dignity and their ideas. But their obligation must always be the responsible, mature, prudent and respectful manifestation.
- At Pedregal we guarantee equal treatment in the face of discrepancies, without considering differences in religion, race, creed, political affiliation and ways of thinking, feeling or acting.

4. KNOWLEDGE STATEMENT

- Every employee must read this document and comply with its guidelines, in addition to reporting any infringement, suspected or real, that he or she has noticed.
- All infringement to the guidelines established in this code shall origin disciplinary measures which could include since a warning until the extinction of the relation with Pedregal. Even, Pedregal may be obliged to report supervising authorities above several types of infractions, in such case the employee could be subjected to administrative, legal or judicial penalties established in the legislation in force.

VII ATTACHMENTS

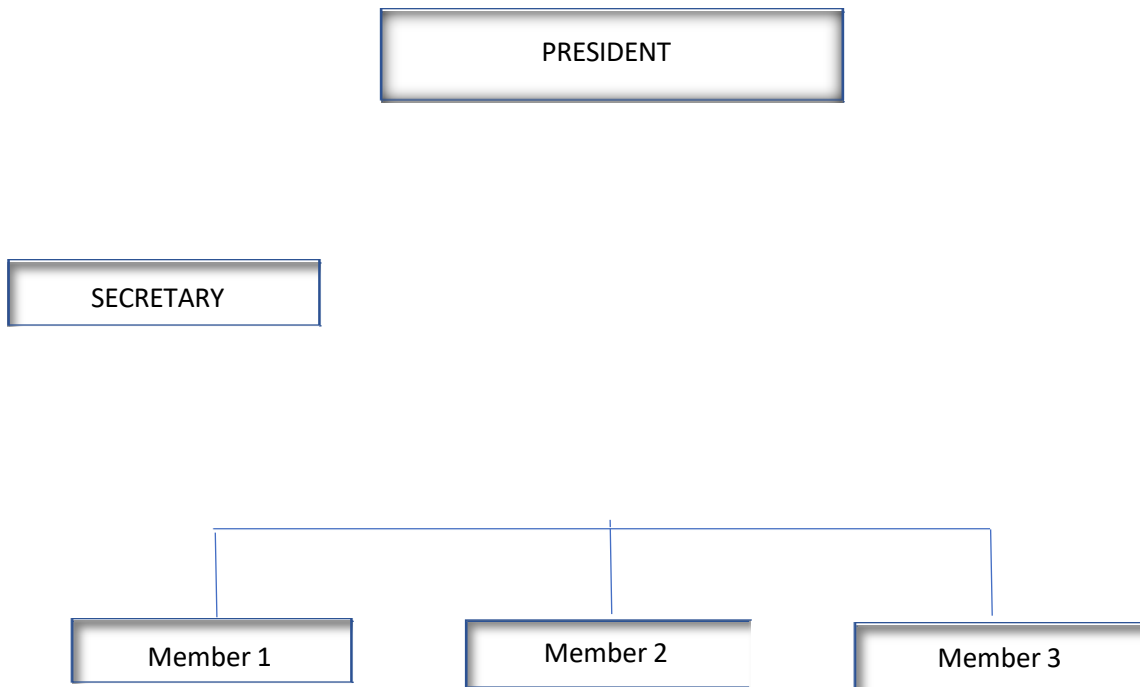
Exhibit A: Chart of the Committee

Exhibit B Committee Members

Pedregal <i>the fruit company</i>	PEDREGAL MANAGEMENT SYSTEM	CODE RA2-PRE-002
PREVENTION:	CODE OF ETHICS AND MANAGEMENT BEHAVIOR	REGULATIONS Version: v.5 Page 18 of 19

EXHIBIT A

Committee's Chart



Pedregal <i>the fruit company</i>	PEDREGAL MANAGEMENT SYSTEM	CODE RA2-PRE-002
PREVENTION:	CODE OF ETHICS AND MANAGEMENT BEHAVIOR	REGULATIONS Version: v.5 Page 19 of 19

Exhibit B

The Committee is compounded by the person as follows:

Full names	Position	Office:
Carolina Jones	Prevention Manager	Lima
Gerardo Cajo	Attorney at law	Ica
Edwin Rebolledo	Assistant manager of Human Resources	Piura
Denisse Samanez	Attorney at law	Piura
Marleny Ojeda	Head of Compensations Strategic Management	Lima
Omar Aquino	Deputy Manager of Accounting	Lima
Alessandra Ahumada	Deputy Manager of Labor Relationship	Lima
Manuel Ríos	Assistant manager of Human Resources	Ica
Nélida Zevallos	Head of Logistic	Trujillo
Yolanda Gálvez	Head of Administration and Process	Lima
Miguel Mendoza	Manager of Management Control and Budget	Lima
Massimo Farro	SAP Supervisor	Lima
Mishell Hernani	Legal Assistant Manager	Lima