



# **Anti-Bribery Management System Policy**

Code: SGAS-PER-PO01  
Version: 07  
Effective Date: 06-11-2023

Classification: Public Use

## ANTI-SBORNO MANAGEMENT SYSTEM POLICY

Political Code  
SGAS-PER-PO01

Political Version  
07

PO Effective Date  
06-11-2023

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### 1 Document Identification

<b>POLICY NAME</b>	Anti-Bribery Management System Policy
<b>POLICY IDENTIFICATION</b>	SGAS-PER-PO01 ESMS: Anti-Bribery Management System PER: Document that applies to Peru PO: Policy Type Document 06: Correlative
<b>ASSOCIATED REGISTRATION(S)</b>	Not applicable
<b>REVIEW PERIOD</b>	Annual review or every time changes are made that warrant modification.

### MANAGEMENT SYSTEM

Establish which Management System the Policy applies to	
<input checked="" type="checkbox"/> ISO 9001:2015 – QMS Quality Management System	<input type="checkbox"/> ISO 27001:2013 – ISMS Information Security Management System
<input type="checkbox"/> ISO 14001:2015 – EMS Environmental Management System	<input type="checkbox"/> ISO 20000-1:2018 – SGS Service Management System
<input type="checkbox"/> ISO 45001:2018 – Occupational Health and Safety Management System (OSHS)	<input checked="" type="checkbox"/> ISO 37001:2016 – SGAS Anti-Bribery Management System
<input type="checkbox"/> ISO 22301:2019 – Business Continuity Management System (BCMS)	<input type="checkbox"/> Other(s): _

### SPECIFIC POLICY APPLICABLE TO

<b>TERRITORY</b>	<b>SEGMENT</b>
<input type="checkbox"/> Chile (CHL)   <input checked="" type="checkbox"/> Perú (PER)   <input type="checkbox"/> Colombia (COL)   <input type="checkbox"/> Spain (ESP)   <input type="checkbox"/> Ecuador (ECU)	<input type="checkbox"/> Corporate (GTD) <input checked="" type="checkbox"/> Corporations (CORP) <input checked="" type="checkbox"/> Enterprises (EMP)
	<input checked="" type="checkbox"/> Wholesalers (MAY) <input type="checkbox"/> Other(s): _

### 2 Policy Approval Control

Version	Prepared by	Date	Reviewed by	Date	Approved by	Date
07	Ernesto Giovanardi Senior Process Analyst	17-10-2023	Juan Salguero Deputy Manager of Management Control Latam	30-10-2023	Carol Saldias Internal Controller Manager	06-11-2023
			Margoth Bonilla Head of Management Systems	23-10-2023	Nicolás Larach Finance Manager Latam	03-11-2023

The only valid version of this Policy is available in SharePoint of the Gtd Management System.  
Not just any printing or digital copy of it is valid, to prevent users from maintaining obsolete versions.

### 3 Policy Description

Gtd Peru develops its activities in the field of information and communication technologies (ICT), delivering the best service experience to our customers, through personalized attention and the delivery of cutting-edge technological solutions adjusted to their needs, always keeping the customer at the center.

In accordance with our level of business integrity, we hereby establish the Anti-Bribery Management System Policy for application to all members and collaborators that make up the organization, its business partners and other relevant stakeholders.

#### In this effort, we are committed to:

1. Prohibit any act or attempt of bribery in the exercise of our business activities as we are aware that this malpractice erodes justice, undermines good corporate governance and hinders business development.
2. Maintain strong commitments to compliance with our Anti-Bribery Management System, anti-bribery laws, and requirements applicable to the organization.
3. Maintain organizational integrity by encouraging all of our staff, business partners, and other stakeholders to raise, in confidence and without fear of retaliation, their concerns in good faith or on the basis of reasonable belief.
4. Ensure the effectiveness of controls and compliance with the Anti-Bribery Management System by having a Compliance Officer, who acts with full authority and independence in the exercise of his or her duties.
5. Orient our Anti-Bribery Management System towards continuous improvement, based on risk management, in order to increase the effectiveness of the management system.

Failure to comply with the Anti-Bribery Management System Policy could lead to the materialization of bribery, which entails negative legal, commercial, operational and/or reputational effects; Likewise, non-compliance with this Policy and the Anti-Bribery Management System will be subject to disciplinary proceedings in accordance with the provisions of the Internal Work Regulations, the current Code of Ethics and the internal procedures of the organization.

### 4 Version control

#### Version History:

Version	Effective on:	Responsible for Change	Details of the changes
05	15-09-2021	Ernesto Giovanardi Process Analyst	The policy was signed by the new general manager of Gtd Peru.
06	21-09-2022	Ernesto Giovanardi Process Analyst	Anti-Bribery Policy Format Change v.05
07	06-11-2023	Ernesto Giovanardi Senior Process Analyst	The commitment to continuous improvement was explicitly separated from the ESMS, which is described in item 05. The format was updated to version 02 of the corporate template.

Note: The date and results of the revisions are recorded and when they generate an update and change to the document, a new version is assigned to the document, otherwise only the revision date is recorded and it reports that no change was identified maintaining the same version. The person in charge of the Review communicates by email to the document manager of the Management Systems area the result of this review for the management of document control.