



CODE OF ETHICS AND CONDUCT

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 UCV UNIVERSIDAD CÉSAR VALLEJO	CODE OF ETHICS AND CONDUCT	Version: 1.0 Valid until: 08/31/2021
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<i>Prevention Officer</i>	<i>General Management</i>	<i>General Management</i>
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INDEX

CONTENT	P.
1. PURPOSE	5
2. OBJECTIVE.....	5
3. SCOPE.....	5
4. CONTENT.....	5
4.1. Principles	5
4.2. Values.....	6
4.3. Corporate Social Responsibility	6
4.4. Behaviors rejected by the Organization.....	6
4.5. Conflict of Interest.....	7
4.6. Gifts and Hospitality.....	8
4.7. Travel.....	9
4.8. Donations.....	10
4.9. Prevention of Money Laundering and Terrorist Financing.....	10
4.10. The Whistleblowing Channel.....	10
4.11. Sanctions.....	11
5. DISSEMINATION, MODIFICATION AND APPROVAL.....	11
6. COMMITMENTS OF THE CODE OF ETHICS AND CONDUCT.....	11
6.1 Regarding the Organization's collaborators and business partners	11
6.2. Regarding the Organization's suppliers and customers.....	11
7. ANNEXES	11
ANNEX No. 1: SWORN STATEMENT OF COMPLIANCE WITH THE CODE OF ETHICS AND CONDUCT FOR EMPLOYEES.	12
ANNEX No. 2: SWORN STATEMENT OF COMPLIANCE WITH THE CODE OF ETHICS AND CONDUCT FOR BUSINESS PARTNER.....	13
ANNEX No. 3: SWORN STATEMENT OF COMPLIANCE WITH THE CODE OF ETHICS AND CONDUCT FOR SUPPLIER.....	14

	CODE OF ETHICS AND CONDUCT	Version: 1.0 Valid until: 08/31/2021
---	---	---

1. PURPOSE

To establish at Cesar Vallejo University SAC (hereinafter the Organization) the principles, values, ethics and conduct accepted by all its shareholders, directors, managers, workers, temporary workers or those under professional and pre-professional internship agreements and the rest of the people under the hierarchical subordination of any of the above, who make up the Organization (hereinafter the collaborators), in addition to business partners, suppliers, consultants and clients.

2. OBJECTIVE

To establish mandatory compliance with the principles, values, ethics, and conduct accepted by the Organization. Likewise, to recognize the internal policies and regulations that govern the actions of its employees, business partners, suppliers, consultants, and clients.

3. SCOPE

It includes all shareholders, directors, managers, workers, temporary workers or those under professional and pre-professional internship agreements and the rest of the people under hierarchical subordination of any of the above, who make up the Organization (hereinafter the collaborators), in addition to business partners, suppliers, consultants and clients.

4. CONTENT

4.1. Principles

Employees, business partners, suppliers, consultants, and clients are required to conduct their business in accordance with the following principles:

- **Principle of Integrity.** Action oriented towards compliance with principles, values, ethics, conduct and general and internal regulations.
- **Principle of Compliance.** They must perform their functions and tasks in strict compliance with national legislation, the rules that regulate the activity of the Organization and the commitments [Environmental, occupational safety, social, among others] that they have assumed.
- **Principle of Transparency and Honesty.** They must conduct their actions and decisions with transparency and honesty towards the Organization.
- **Principle of Due Diligence.** They must make informed and reasonable decisions, and perform their duties in the best interests of the Organization. They will be jointly and severally liable for any damages caused to the Organization and its shareholders by their fraudulent or grossly negligent actions.
- **Principle of Loyalty.** They must subordinate personal interests to the interests of the Organization. Furthermore, they may not participate, either on their own behalf or on behalf of third parties, in activities that compete with the Organization.
- **Principle of Confidentiality.** They must keep or safeguard the information that, by virtue of their position, they have access to in the exercise of their activities, functions, responsibilities or operations inherent to the business of the Organization and that has not been publicly disclosed.

	CODE OF ETHICS AND CONDUCT	Version: 1.0 Valid until: 08/31/2021
---	---	---

by the Organization. It will not apply when the reservation: i) Harms the social interest, ii) Refers to acts or omissions constituting an infringement of the social statutes or current legislation, and iii) Its disclosure is ordered by virtue of a judicial, arbitral, fiscal or administrative mandate that so orders.

4.2. Values

The Organization recognizes the following values as guiding its business activities and those of its employees, as well as business partners, suppliers, consultants and clients:

- Respect for general and internal regulations.
- Ethical behavior.
- Environmental protection.
- Combatting and rejecting corruption (bribery, collusion, influence peddling, among others), money laundering, financing of terrorism (Law No. 30424 and its regulations) and private corruption (Legislative Decree No. 1385)
- Fight against and rejection of harassment of any kind, including sexual harassment and discrimination, in any of its forms.
- Promotion of honesty, transparency, objectivity and equal opportunities, primarily in the selection of suppliers.

4.3. Corporate Social Responsibility

The Organization understands Corporate Social Responsibility as a business vision that integrates the management of the Organization, compliance with the Law and respect for our principles, values, ethics and conduct.

In this regard, it commits from its highest levels to participate in and promote activities that contribute to the development and well-being of people and communities in its geographical areas of influence, for which it may make donations to said communities or local governments, provided that these gifts are not linked to consideration for illegal favoring of any kind to the Organization or to a third party.

4.4. Behaviors rejected by the Organization

The Organization, from its highest levels, makes the necessary efforts to prevent conduct contrary to its principles and values, and promotes activities that respect the Law and commitments established in this Code of Ethics and Conduct; likewise, the following conduct is rejected:

- Acts of Corruption (Bribery, Collusion, Influence Peddling, among others), Money Laundering, Financing of Terrorism (Law No. 30424 and its Regulations) and Private Corruption (Legislative Decree No. 1385).
- Criminal acts in general.
- Harassment of any nature, including sexual harassment and discrimination in any of its forms.
- Drug or alcohol use on the Organization's premises.
- Alter or falsify information.
- Attacks against the Environment.

 UCV UNIVERSIDAD CÉSAR VALLEJO	CODE OF ETHICS AND CONDUCT	Version: 1.0 Valid until: 08/31/2021
--	-----------------------------------	---

- Participating in or failing to promptly report activities that create a conflict of interest with those of the Organization.
- To use the social assets of the company for their own benefit, whether direct or indirect Organization.
- Do not report any of the above.

4.5. Conflict of Interest

In fulfilling their duties, employees must act and make decisions always seeking the benefit of the Organization and not based on personal or third-party interests or relationships, trying to avoid any conflict of interest.

In general terms, a conflict of interest is understood to exist when the ability to make objective decisions in the best interest of the Organization is affected by a situation, fact or position in which one's personal interests, those of one's spouse, close relatives (up to the fourth degree of consanguinity and second degree of affinity) or of third parties in general, are contrary to the interests of the Organization.

In this sense, there is a conflict of interest when:

- There are conflicting interests between an employee and the interests of the Organization, which may lead to decisions or actions that benefit themselves or others and are detrimental to the interests of the Organization.
- Any circumstance exists that may reduce the independence, fairness or objectivity of the actions of any collaborator of the Organization and that may be detrimental to the interests of the Organization.
- In general, when any employee finds themselves in a situation where they face different courses of action in relation to their own interests or the interests of a third party and the interests of the Organization.

Employees must act with diligence and loyalty towards the Organization and refrain from intervening directly or indirectly in decisions with which there is a conflict of interest, according to the definition cited above.

Employees must disclose any conflict between their personal interests and the interests of the Organization when dealing with clients, suppliers, contractors, or any person who conducts or intends to conduct business with the Organization or with companies in which it has a direct or indirect stake or interest.

The Organization believes that conflicts of interest should be managed and resolved according to the specific characteristics of each case. Any situation that raises doubts about the possible existence of a conflict of interest should be treated as if one existed.

Therefore, employees who find themselves facing a potential conflict of interest, or believe they may be facing one, must immediately inform the Management to which they report.

Without prejudice to the legal prohibitions to which employees are subject, including the general prohibition against using their position to obtain undue advantages for themselves or

	CODE OF ETHICS AND CONDUCT	Version: 1.0 Valid until: 08/31/2021
---	---	---

for related third parties to the detriment of the Organization's interests, and as will be noted later regarding related party transactions, the following are some guidelines to avoid the most common conflicts of interest situations:

- **Commercial/contractual relationships with third parties:** Employees must avoid participating or becoming involved, directly or indirectly, in activities that are contrary to or inconsistent with the interests of the Organization.
- **Gifts:** Employees may not accept or receive, either directly or indirectly, from third parties with whom the Organization has or could have a commercial and/or contractual relationship, gifts, presents or advantages of any kind or type, including cash or its equivalent, when they are intended to influence their actions in relation to the activity of the Organization, the value of such gifts is relevant or when their acceptance generates or may generate a conflict of interest or the expectation of undue consideration.

Within the framework indicated, any violation of the stipulations must be reported immediately to the Management to which they depend or to the Prevention Officer.

4.6. Gifts and Hospitality.

The giving or receiving of gifts is not prohibited by the Organization, provided that the following provisions are observed:

- These gifts must be made after prior reporting and authorization from the corresponding management, provided that the value of the gift does not exceed S/. 500 (five hundred and 00/100 new soles). If the gift exceeds the aforementioned amount, the express authorization of the Prevention Officer will be required.
- They are not carried out with the intention of influencing the acquisition or retention of business, gaining an advantage in this business, or, in general, rewarding a decision favorable to the Organization or third parties.
- They are not carried out to obtain or reward any favor from a public servant or official public, whether by a decision already made or yet to be made.
- They are made with the sole purpose of offering a formal gift or being in accordance with customs and traditions.
- Do not include cash or cash equivalent.
- They are carried out publicly and in compliance with the formalities and procedures arranged by those involved or by current laws.
- Approval will not be required, provided that they are customary gifts such as pencils, pens or keyrings of little value offered on the premises of the Organization or of third parties, within the framework of a business meeting.

Regarding hospitality, invitations to business lunches, meals, or corporate events may be offered or accepted by employees of the Organization, provided that they are made in accordance with the following provisions:

 UCV UNIVERSIDAD CÉSAR VALLEJO	CODE OF ETHICS AND CONDUCT	Version: 1.0 Valid until: 08/31/2021
--	-----------------------------------	---

ÿ This must be done with prior reporting and authorization from the corresponding management, provided that the value does not exceed S/ 200 (two hundred and 00/100 new soles) per person. If the hospitality or invitation exceeds the aforementioned amount, the express authorization of the Prevention Officer will be required.

ÿ They are carried out to strengthen working relationships or for commercial dissemination purposes.

ÿ It is not done to obtain or retain business, gain an advantage in business, or, in general, to reward a decision favorable to the Organization or third parties.

ÿ It is carried out in places appropriate for the business or corporate event.

ÿ Do not perform in excessively expensive or ostentatious places.

ÿ All expenses incurred must be duly supported with details of consumption.

ÿ Ideally, two or more officials from the Organization should attend.

ÿ Approval will not be required, provided they are customary courtesies such as drinks, sandwiches or snacks of little value offered on the premises of the Organization or of third parties, within the framework of a business meeting.

While this Code of Ethics and Conduct addresses a range of situations that employees, business partners, contractors, consultants, or suppliers may encounter, it cannot cover every possible scenario. If you are unsure about the correct course of action or have knowledge of facts that need to be reported, it is imperative to consult with or report such situations directly to the Prevention Officer or through the Organization's communication channels.

4.7. Travel

Regarding trips that the Organization may offer or accept to suppliers, clients, authorities or third parties in general; these are not prohibited as long as the following provisions are met:

ÿ They must be carried out after prior report and authorization from the Prevention Officer.

ÿ It is carried out for the sole purpose of disseminating and training on the services and products offered by the Organization or third parties.

ÿ The invitation will not be directed to a specific person, but the company or institution receiving the invitation must determine the person who will attend, provided that, due to their position and professional profile, they are suitable to receive the technical and commercial information of the services or products that are being promoted.

ÿ Travel, accommodation and per diem expenses should not be excessively expensive and ostentatious; they should be appropriate to the location of the meeting or corporate event.

ÿ Travel, accommodation and per diem expenses will be contracted directly by the Organization, avoiding giving cash to the guest.

	CODE OF ETHICS AND CONDUCT	Version: 1.0 Valid until: 08/31/2021
---	-----------------------------------	---

- The invitation will only include the representative or official selected by the company or institution as appropriate, and it is prohibited for it to extend to family members or third parties.

While this Code of Ethics and Conduct addresses a range of situations that employees, business partners, contractors, consultants, or suppliers may encounter, it cannot cover every possible scenario. If you are unsure about the correct course of action or have knowledge of facts that need to be reported, it is imperative to consult with or report such situations directly to the Prevention Officer or through the Organization's communication channels.

4.8. Donations

Regarding donations, they are not prohibited as long as they are made in compliance with the following provisions:

- It must be carried out with transparency and in full compliance with the legal framework of the matter.
- It must not be done to circumvent the provisions on gifts or hospitality of the Organization.
- It must be directed exclusively to communities, organizations, authorities or local governments in the area of influence of the Organization, after verifying that they are entities registered as recipients of donations.
- It must be done with the aim of providing a benefit to the safety and quality of life of the population of the area of influence.
- It is forbidden to give donations or finance political organizations.

While this Code of Ethics and Conduct addresses a range of situations that employees, business partners, contractors, consultants, or suppliers may encounter, it cannot cover every possible scenario. If you are unsure about the correct course of action or have knowledge of facts that need to be reported, it is imperative to consult with or report such situations directly to the Prevention Officer or through the Organization's communication channels.

4.9. Prevention of Money Laundering and Terrorist Financing

As part of its regulatory compliance, the Organization implemented an Anti-Money Laundering and Counter-Terrorist Financing System to prevent illicit assets from being incorporated into the Organization's assets. The mechanisms and procedures of this System are established in the Organization's Anti-Money Laundering and Counter-Terrorist Financing Manual, which must be followed by all employees without exception.

4.10. The Whistleblowing Channel

This Code of Ethics and Conduct establishes that the channels for handling complaints will be, on the one hand, the tool called "Compliance: Complaints Channel" located on the Organization's website (www.ucv.edu.pe) Another email address, oficial.splaf@ucv.edu.pe, will serve as the mail internal tool for collecting complaints from

	CODE OF ETHICS AND CONDUCT	Version: 1.0 Valid until: 08/31/2021
---	---	---

The Organization and its collaborators are responsible for conduct that could violate this Code of Ethics and Conduct and recognized internal regulations. It also includes the complaints related to the possible commission of criminal offenses.

Information received through the reporting channel will be protected with strict confidentiality.

This Code of Ethics and Conduct encourages any person to report the acts detailed above, guaranteeing that there will be no retaliation and that reports will be addressed without distinction.

4.11. Sanctions

Failure to comply with the Code of Ethics and Conduct or recognized internal regulations, whether by action or omission, will be governed by the Organization's Internal Work Regulations. The evaluation and identification of the infraction will be the responsibility of the functionally responsible area. The human resources office, or its equivalent, will apply the corresponding sanction in accordance with current labor regulations.

5. DISSEMINATION, MODIFICATION AND APPROVAL

The Code of Ethics and Conduct will be disseminated through the internal communication channels established by the Organization. Its modification and approval are the responsibility of the General Management.

6. COMMITMENTS OF THE CODE OF ETHICS AND CONDUCT

6.1 Regarding the Organization's collaborators and business partners

All employees and business partners of the Organization are required to sign a Sworn Statement of compliance with the Organization's Code of Ethics and Conduct. **(See Annexes No. 1 and 2).** The Human Resources Office, or its equivalent within the Organization, will be responsible for collecting, managing, and safeguarding the duly signed sworn statement.

6.2. Regarding the Organization's suppliers and customers

All suppliers and customers of the Organization are required to sign a sworn statement of compliance with the Organization's Code of Ethics and Conduct **(See Annex No. 3).**

The Logistics Office or whoever acts in its place in the Organization, will be responsible for collecting, managing and safeguarding the aforementioned sworn statement duly signed by every supplier and client of the Organization, at the beginning of the business relationship.

7. ANNEXES

The

annexes form an integral part of this Code of Ethics and Conduct.

- Sworn Statement of Compliance with the Code of Ethics and Conduct for Annex No. 1: Contributors.
- Annex No. 2: Affidavit of Compliance with the Code of Ethics and Conduct for Business Partners.
- Annex No. 3: Sworn Statement of Compliance with the Code of Ethics and Conduct for Suppliers and Customers

ANNEX No. 1: SWORN STATEMENT OF COMPLIANCE WITH THE CODE OF ETHICS AND CONDUCT FOR EMPLOYEES.

I, ... identified with ID No. residing at with district of province and department in my capacity* as of the Cesar Vallejo University (**hereinafter the Organization**), declare under oath:

1. Respect and comply with the Organization's Code of Ethics and Conduct.
2. Reject acts of corruption (Bribery, Collusion, Influence Peddling, among others), Money Laundering, Terrorist Financing and Private Corruption.
3. To understand the scope of Law No. 30424, "Law on the Liability of Legal Entities," its Regulations and amendments. To understand the sanctions it contemplates and, in general, the consequences that the commission of the crimes foreseen therein may entail.
4. To know the scope of Legislative Decree No. 1385 "Which sanctions corruption in the private sector" and, in general, the consequences that the commission of the crimes foreseen therein may entail.
5. To know the content and scope of the Organization's Prevention Model, as well as its Internal Policies and Directives, to prevent the commission of Acts of Corruption (Bribery, Collusion, Influence Peddling, among others), Money Laundering, Financing of Terrorism and Private Corruption.
6. To fully comply with the provisions of the Code of Ethics and Conduct and the Prevention Model of Organization.
7. Communicate any relevant information to the Organization's Prevention Officer. to identify non-compliance with the Prevention Model.

In witness whereof, and acknowledging the administrative, civil and criminal consequences of any false statements made herein, I hereby submit this SWORN STATEMENT on the day of of 202....

Signature

Post:
ID No.....

* Collaborator, partner or shareholders.

ANNEX No. 2: SWORN STATEMENT OF COMPLIANCE WITH THE CODE OF ETHICS AND CONDUCT FOR BUSINESS PARTNER

I, ... identified with ID No. residing at with district of province and department in my capacity as Legal Representative of the company....., with Taxpayer Identification Number (RUC) No....., with tax domicile..... district of province and department as a Commercial Partner of Cesar Vallejo University (**hereinafter the Organization**), declare under oath:

1. Respect and comply with the Organization's Code of Ethics and Conduct.
2. Reject acts of corruption (Bribery, Collusion, Influence Peddling, among others), Money Laundering, Terrorist Financing and Private Corruption.
3. To know the scope of Law No. 30424 "Law of Liability of Legal Entities" Regulations and amendments. The sanctions they contemplate and, in general, the consequences that the commission of the crimes foreseen therein may entail.
4. To know the scope of Legislative Decree No. 1385 that sanctions corruption in the private sector. The sanctions it contemplates and, in general, the consequences that the commission of the crimes foreseen therein may entail.
5. To know the content and scope of the Organization's Prevention Model, as well as its Internal Policies and Directives, to prevent the commission of Acts of Corruption (Bribery, Collusion, Influence Peddling, among others), Money Laundering, Financing of Terrorism and Private Corruption.
6. To fully comply with the provisions of the Code of Ethics and Conduct and the Prevention Model of Organization.
7. Not having a final criminal sentence for Acts of Corruption (Bribery, Collusion, Influence Peddling, among others), Money Laundering, Financing of Terrorism and Private Corruption.
8. Communicate any relevant information to the Organization's Prevention Officer to identify non-compliance with the Prevention Model.
9. Allow verification of compliance with the Code of Ethics and Conduct scheduled by the Organization.
10. In the event of any breach of the Code of Ethics and Conduct, the Organization will evaluate and terminate all business relationships in order to disclaim any liability.

In witness whereof, and acknowledging the administrative, civil and criminal consequences of any false statements made herein, I hereby submit this SWORN STATEMENT on the day of of 202....

Signature

Legal Representative:

ID No.

Business Partner:

RUC No.

	CODE OF ETHICS AND CONDUCT	Version: 1.0 Valid until: 08/31/2021
---	-----------------------------------	---

ANNEX No. 3: SWORN STATEMENT OF COMPLIANCE WITH THE CODE OF ETHICS AND SUPPLIER CONDUCT

I, ... identified with ID No. residing at with district of province and department in my capacity as Legal Representative of the company....., with Taxpayer Identification Number....., with tax domicile..... district of province and department as Supplier of the Cesar Vallejo University (**hereinafter the Organization**), declare under oath:

1. Respect and comply with the Organization's Code of Ethics and Conduct.
2. Reject Acts of Corruption (Bribery, Collusion, Influence Peddling, among others), Money Laundering, Terrorist Financing and Private Corruption.
3. To understand the scope of Law No. 30424, "Law on the Liability of Legal Entities," its Regulations and amendments. This includes the sanctions it contemplates and, in general, the consequences that may result from committing the crimes stipulated therein.
4. To understand the scope of Legislative Decree No. 1385, which penalizes corruption in the private sector. This includes the sanctions it provides for and, in general, the consequences that may result from committing the crimes stipulated therein.
5. To know the content and scope of the Organization's Prevention Model, as well as its Internal Policies and Directives, to prevent the commission of Acts of Corruption (Bribery, Collusion, Influence Peddling, among others), Money Laundering, Financing of Terrorism and Private Corruption.
6. To fully comply with the provisions of the Code of Ethics and Conduct and the Prevention Model of Organization.
7. Not having a final criminal sentence for Acts of Corruption (Bribery, Collusion, Influence Peddling, among others), Money Laundering, Financing of Terrorism and Private Corruption.
8. Communicate any relevant information to the Organization's Prevention Officer to identify non-compliance with the Prevention Model.
9. Allow verification of compliance with the Code of Ethics and Conduct scheduled by the Organization.
10. In the event of any breach of the Code of Ethics and Conduct, the Organization will evaluate and terminate all business relationships in order to disclaim any liability.

In witness whereof, and acknowledging the administrative, civil and criminal consequences of any false statements made herein, I hereby submit this SWORN STATEMENT on the day of of 202....

Signature

Legal Representative:
 ID No.
 Supplier:
 RUC No.