



ANTI-BRIBERY POLICY AND MODEL OF PREVENTION

Prepared by:	Reviewed by:	Approved by:
Integrated System of Management	Officer of Compliance	General manager
Date: 20/07/2026	Date: 23/07/2026	Date: 30/07/2026

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ANTI-BRIBERY POLICY AND CRIME PREVENTION MODEL

This ANTI-BRIBERY POLICY AND PREVENTION MODEL reflects our organization's ongoing commitment to conducting its activities under the highest standards of ethics, transparency, compliance, and accountability. We also promote an organizational culture based on compliance, encouraging all our employees, business partners, and other stakeholders to act in accordance with our values and to report in good faith any conduct or situation that may constitute a breach or an act of bribery.

At GRUPO ELECTRODATA SAC we are firmly committed to combating bribery in any of its forms, as well as crimes regulated by applicable regulations, by establishing principles, policies and procedures that guide the behavior of all our employees, business partners and other stakeholders.

At GRUPO ELECTRODATA SAC, we expressly prohibit bribery in any form, whether direct or indirect, in relation to a public official or body or a private person or organization, as well as any type of behavior or action that may constitute a violation of current legislation regarding bribery and other crimes.
related.

The General Manager of GRUPO ELECTRODATA SAC has approved this POLICY, which promotes a culture of integrity and compliance throughout the organization, ensuring the availability of resources, ethical leadership, and the continuous strengthening of the Anti-Bribery Management System and the Prevention Model, aligned with the requirements of the international standard ISO 37001:2025, Law No. 30424, amendments and current regulations, in order to prevent, control and manage any **criminal or** bribery risk to which our organization may be exposed.

This POLICY applies to all members of GRUPO ELECTRODATA SAC, headquartered at AV. PRINCIPAL NRO. 456, Surquillo, Lima, Peru, in the development of its activities related to the marketing of ICT equipment, services, and solutions; the provision of Help Desk services; outsourcing; Network Operations Center (NOC)/Security Operations Center (SOC); and the implementation of ICT projects; as well as to business partners and other stakeholders. We also make the following commitments:

- Establish controls and action plans to prevent, control, reduce and manage identified risks to levels acceptable to the organization.
- Require compliance with the Peruvian state's anti-bribery legislation applicable to the organization, the requirements of ISO 37001 and other legal requirements applicable to the entity.
- To encourage the raising of concerns in good faith or based on a belief reasonable, in confidence and without fear of reprisals.
- To promote a culture of anti-bribery and anti-corruption among all our staff and third parties with whom we interact, seeking continuous improvement.

INTEGRITY AT THE HEART OF ALL OUR ACTIONS

At GRUPO ELECTRODATA SAC, we periodically identify and assess bribery risks and other risks outlined in Law 30424 and its amendments, taking into account the legal and regulatory obligations applicable to the organization and the risks to which our activities are exposed. We document the results in our RISK ASSESSMENT. We establish risk control plans for our analyzed and evaluated risks, which are considered above or below low, with the clear objective of preventing and reducing their probability of occurrence, as well as establishing monitoring and control mechanisms.

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As a result of internal and external mechanisms for evaluating the effectiveness of our ANTI-BRIBERY MANAGEMENT SYSTEM **AND PREVENTION MODEL**, as well as based on the information collected, analyzed and evaluated, we have established control and monitoring measures, committing ourselves to continuously improve the effectiveness of our **ANTI-BRIBERY MANAGEMENT SYSTEM and Prevention Model**, with the aim of creating a truly dynamic system capable of adapting to changing market circumstances and to improvements, opportunities and failures detected.

To ensure maximum independence, we have designated a specific position within our organizational structure called the Prevention Officer/Compliance Officer. This individual is endowed with the capacity, autonomy, independence, and authority to oversee the proper design, implementation, monitoring, **and** improvement of our ANTI-BRIBERY MANAGEMENT SYSTEM AND PREVENTION MODEL, which is implemented in accordance with Law No. 30424, its amendments, and current regulations. Reporting directly to the General Manager and the Board of Directors, the designated Prevention Officer/Compliance Officer is available to all members of our organization to advise, guide, and support them on matters of ethical conduct and compliance.

We have a current CODE OF CONDUCT, ETHICS, AND ANTI-BRIBERY, approved by the General Manager. This CODE, along with the disciplinary consequences for non-compliance, applies to all members of GRUPO ELECTRODATA SAC, without prejudice to any legal consequences that may arise from acts, events, or behaviors that violate the law. In this regard, we have a disciplinary system in place to sanction conduct contrary to this POLICY, our CODE OF ETHICS, and the other requirements of our ANTI-BRIBERY MANAGEMENT SYSTEM AND PREVENTION MODEL.

Every member of our organization and/or person acting in an authorized manner on behalf of or for the account of GRUPO ELECTRODATA SAC has the obligation to inform and/or report any action, conduct, information or evidence that is likely or suspected of violating this POLICY, the requirements of the ANTI-BRIBERY MANAGEMENT SYSTEM or the controls of the Prevention Model implemented in accordance with Law No. 30424, its amendments and its current Regulations of our organization and that may constitute criminal conduct by action or omission.

At GRUPO ELECTRODATA SAC, the following means has been provided for anyone to report any type of incident:

- Registration of the communication through the secure COMPLAINT CHANNEL provided by our organization accessible on our company website (<https://www.electrodata.com.pe/>) or by directly accessing the link <https://www.sofidya.com/grupoelectrodatasac/canal-etico>.

At GRUPO ELECTRODATA SAC, we highly value and strongly encourage the reporting of any indication or suspicion of illegal activity by any member, person, or organization linked to our organization. Therefore, we appreciate you providing as much detail as possible in your report of the alleged facts. Our organization has established secure internal mechanisms and processes to guarantee the confidentiality and anonymity of all reports received, as well as to protect individuals who participate in our efforts to combat bribery **and other crimes** through reporting and disclosure from any type of threat, **retaliation**, or coercion.

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HISTORICAL CONTROL OF CHANGES

Version	Date	Change or Modification	Section
00	14/07/2025	Document creation	-
01	15/10/2025	English version added	-
02	30/07/2026	Prevention model 30424 is added and specified the reference to stakeholders	All