



**Profonnanpe**  
Comprometidos por naturaleza

# Code of Ethics

November 2021



## PROFONANPE'S CODE OF ETHICS

### CHAPTER I

#### OBJECTIVE

Profonanpe's Code of Ethics aims to provide the general patterns of behavior for its employees and consultants / suppliers who are hired to provide professional, general or specific services; so that their actions adequate to the institutional values and ethical principles necessary to ensure transparency in internal relationships and in relations with persons and / or entities with whom Profonanpe has contact or has a contract-based or interagency working relationship; and to promote sustained healthy work relationships guided by the principles of morality, honesty and personal ethics.

The Code of Ethics also has as a purpose i) to establish the procedure to prevent aspects related to conflicts of interest, ii) to avoid situations that may cause this sort of conflicts, and; iii) in case they may be present, to know how to act properly.

This is also valid in case of signs or acts of corruption during expenses execution and hiring that Profonanpe may detect, or when receiving a report of alleged dishonest acts from its hired staff.

#### SCOPE

This code and the obligations that may derive from it, apply to all employees, consultants and generally to all persons and / or suppliers providing services in and for Profonanpe, whatever their working arrangements is, type of contract and / or funding source, and in the framework of their scheduled activities or tasks as appropriate.

All Profonanpe workers, consultants and suppliers mentioned in the previous paragraph, whatever the type of their contract, shall take cognizance of this Code of Ethics and a commit to abide by it.

In order to prevent possible conflict of interest cases, the workers, consultants / suppliers hired to lend professional services, in general, to Profonanpe, during its permanency and validity of their contractual relation, should observe the following:

- a.- They must protect their independence and avoid all possible conflict of interest, by rejecting presents or gratifications that may be interpreted as attempts to influence over the independency and integrity of the worker.
- b.- They must avoid relationships with people that could influence, compromise or threaten the worker's capacity to act with interdependence and portray the image of an independent performance.
- c.- They should not use their position for private purposes and must avoid relationships that imply a corruption risk or that may cause doubts about their objectivity and independence.
- d.- They should not use information received during the performance of their obligations, as a way to obtain personal benefits or favors from third parties. They may not disclose information that gives unfair or unjustified advantages to other people or organizations; neither should they use such information to damage third parties.



Profonanpe will not tolerate other kinds of behavior that may violate or threaten our Code of Ethics or other internal or external policies. We encourage the prompt internal notification of violations to this Code to your immediate superior boss.

Disciplinary measures will be taken against all violations to the Code and the obligations that may derive from it. The measures may go from a verbal warning to dismissal, according to the severity of the fault.

## **CHAPTER II**

### **LEGAL GROUNDS**

- 1.- Supreme Decree 003-97-TR, Single Conformed Text of Legislative Decree 728, Labor Productivity and Competitiveness Law.
- 2.- Decree Law 26154, Creation of PROFONANPE and Regulations thereunder, Supreme Decree 024-93-AG, as amended.
- 3.- Profonanpe by-laws.

## **CHAPTER III**

For purposes of this Code of Ethics and in accordance with the provisions of Decree Law 26154 that created Profonanpe and the Regulations thereunder, Supreme Decree 024-93-AG as amended, its By-laws, and the provisions of Supreme Decree 003-97-TR, Single Conformed Text of Legislative Decree 728, Law of Productivity and Competitiveness Act, the following terms will have the meanings described below:

### **Organizational ethics:**

The performance of Profonanpe's workers and consultants providing professional services through specific service contracts and/or of multiple service providers contracted by the institution for various requirements, based on the observance of values, principles and duties that ensure professionalism and effectiveness in exercising their functions and /or the roles for which they have been hired by the institution.

### **Conflicts of interest:**

A situation in which persons, because of their activity, may choose between alternative options for their personal or a third party's benefit.

A conflict of interest presents when personal, familiar or business interests from the workers, consultants / suppliers hired to lend professional services, punctual and/or specific may affect their impartial performance in their role, position or commission.

The conflict of interest could be:

Potential: No conflict of interest now, but in the future, depending on certain circumstance, it may appear.

Real: When an interest partially influences a workers' performance of his or her activities.

### **Ethical principles:**

Basic beliefs about the right way to relate to others and the world, and that lay the foundation of the ethical value system to which the person or group is ascribed.

### **Responsibility:**

Fully and comprehensively meet one's duties, and provide appropriate responses to what is expected from a person or company, institution, group or society.

## **CHAPTER IV**

### **GENERAL PROVISIONS**

1. Profonanpe is a private organization. This code is a self-regulation. It is not mandated by law.

2. This Code of Ethics seeks to provide an ordered set of rules to guide the ethical behavior of Profonanpe's employees in the exercise of their duties or positions, and of the people who provide a professional service or other services to the institution. It is an instrument of transcendent value because it sets out exemplary behavior patterns that contribute to fight corruption and to provide an efficient service to Profonanpe.

3. Profonanpe employees must be a model of exemplary behavior guided by the values of respect, integrity, efficiency, appropriateness, truth, obedience, justice, fairness and loyalty to the institution for which they work, all of which must be demonstrated and proved permanently through the transparent performance of their daily duties and chores.

Transparent practice of these values contributes to preserve and strengthen Profonanpe, which in turn will contribute to equity and justice in our society.

A similar behavior is expected from all consultants or others providing professional services or supplying goods, equipment, or others to Profonanpe.

4. Profonanpe employees must act with honesty, respecting individual rights so that they will be trusted both within the institution and by third parties.

5. Profonanpe workers must avoid improper behavior, and show integrity in all their actions. In social life, they should behave with dignity, restraint and sensitivity towards issues of general interest. In carrying out their duties, they must abide by the principles of neutrality, transparency, privacy and confidentiality in using the information or documentation received or obtained in doing their work or by reason of their position, and in using the assets belonging to the institution. They will likewise perform their functions or role with responsibility.

6. Upon learning this Code of Ethics, Profonanpe employees commit to its fulfillment.

7. The provisions of this Code are ethical in nature. As such, its norms and eventual corrective actions are independent of any disciplinary or legal sanction.

## CHAPTER V

### DUTIES

People comprised in the scope of this Code must act according to the following principles:

1. **Neutrality:** They must act with absolute impartiality, whether political, economic or other during the performance of their functions or services ordered or contracted, demonstrating independence from other individuals, political parties or institutions.

2. **Transparency:** In performing acts of service, Profonanpe's, as well as hired consultants and service suppliers, must act with transparency, which means that at all times they shall act with integrity and specially, but not limited to, regarding the observance of rules on fraud and corruption set forth by Profonanpe. They will avoid conflicts of interest and abide by any other special provisions contained in this document and other regulations or guidelines that Profonanpe may enact in the future.

The employee and, in general, any hired person or entity, must provide and facilitate trustworthy, reliable and thorough information, and timely perform their duties or services as contracted by Profonanpe.

3. **Discretion:** They must keep reserve about any facts or information they have been provided by Profonanpe to perform or during the course of their work or services, without prejudice to the duties and responsibilities required in the agreements signed with such employees, consultants and suppliers.

4. **Proper Performance on the Job:** On the occasion or during the performance of their duties, Profonanpe employees and generally any consultant, supplier or person contracted by Profonanpe should not take any retaliation or exercise coercion against any other Profonanpe worker or employee, or other persons or third parties.

5. **Responsibility:** All Profonanpe employees must perform their functions fully and comprehensively, with absolute respect for the position for which they were hired. This precept is equally applicable with respect to the exercise and development of activities by consultants / suppliers.

Under extraordinary circumstances, Profonanpe employees and generally, any person hired within the scope of this document, may engage in tasks that by their nature or modality do not strictly pertain to their role, provided those activities are necessary to mitigate, neutralize or overcome any arising difficulty.

All Profonanpe workers must respect the rights of their co-workers and immediate supervisors or subordinates, and conversely, and in general, regardless of their respective hierarchy within

the institution. This is equally applicable with respect to contracted consultants / suppliers in relation to Profonanpe staff or other third parties with whom they interact on behalf of Profonanpe in performing contracted services.

6. Profonanpe employees have a duty to serve Profonanpe loyally, a principle equally applicable to consultants / suppliers hired by PROFONANPE. This provision shall be interpreted in the sense of acting with loyalty and integrity when delivering the contracted services.

In this regard, they must act honestly, fairly and efficiently, with skill and understanding, bearing in mind the respect they owe to the interests of the institution, as befits relevant circumstances.

7. Profonanpe employees, whatever their hierarchy or role within the institution, must be polite and pleasant in their relationships with co-workers (superiors, colleagues and subordinate staff), and with third parties (consultants, suppliers, companies, etc.), with whom they must interact, always providing quality work, promptness and consideration. This provision is equally applicable to consultants / suppliers hired by Profonanpe. The above guidelines must be also observed when delivering the contracted services and when dealing with staff of the institution or others with which they interact in the execution of the contracted services.

8. Profonanpe employee and generally persons / suppliers contracted within the scope of this document must meet their responsibilities and provide services, respectively, as specified in the Terms of Reference of their contracts and general contractual provisions entered into with the institution. For this purpose, it is expressly provided that in carrying out their work / services they shall not engage in or promote acts involving discriminatory practices or behavior towards other staff or others, by making any statements with respect to gender, race, color, religion, culture, education, social status, disability, age, sexual orientation, marital status or nationality, political preferences and other of similar nature.

9. Profonanpe employees and generally, contracted persons / suppliers must generate and transmit useful, timely, relevant, understandable, reliable, and verifiable information to their superiors or the institution, respectively, and to any person entitled to assess their activities.

10. Profonanpe employees and generally, contracted persons / suppliers must be permanently ready to perform their functions or render the services procured, acting with equity in their interpersonal and inter-agency relationships, whatever their hierarchy within the institution, both toward their subordinates and superiors and with anyone they interact with in connection with their activities.

11. Profonanpe employees and generally contracted persons / suppliers must fulfill their assigned duties and / or contracted with honesty, respectively.

12. Profonanpe employees must report any misconduct they may come to know of during the performance of their duties or due to their function and responsibilities, and that could cause injury, constitute a crime or infringe the provisions of this Code. This provision is equally applicable to consultants / suppliers contracted by Profonanpe that in implementing their contracted services may take cognizance of criminal or improper acts, as indicated in the preceding paragraph.



## CHAPTER VI

### PROHIBITIONS

6.1 The following prohibitions apply to all persons under the scope of this Code:

- a. Conflict of interest: To maintain relationships or engage in situations where their personal, business, economic or financial interests could come into conflict with the performance of their duties and functions or the delivery of contracted services.
- b. Undue advantage: To get or seek improper benefits or advantages for themselves or for others, through the use of their position, authority, influence or appearance of influence.
- c. Political proselytizing: To conduct political campaigning through the use of their office or through the use of infrastructure, property or resources of the institution, either for or against political parties or organizations or candidates.
- d. Misuse of insider information. To participate in financial transactions or operations or operations in general, using insider or private (not publicly available) information of Profonanpe or accessing it by exercise of their status or position held, or allow the improper use of such information for the benefit of any interest, either their own or a third party's.
- e. Press, threaten and / or harass: To exert pressure, threats or harassment against other workers or subordinates, regardless of their hierarchy in Profonanpe, or any third parties providing services to it, which may affect their personal dignity or induce them to act with malice.
- f. Nepotism: To intervene in recruitment processes, appointment to positions of trust, pro bono activities or appointment of honorary members of management, evaluation or other committees at Profonanpe for undertaking any of its various activities and projects, for the benefit of relatives within the fourth degree of consanguinity, second degree of affinity, or by exercising direct or indirect influence in any of the above cases.
- g. To request and receive in a personal capacity or through third parties, any awards, commissions, benefits, participation, gifts or any other similar benefit, as well as from bidders or contractors of goods and services that may compromise Profonanpe and the exercise of the assigned functions.
- h. To devote regular work hours to matters other than the strict performance of their duties, except for teaching or training activities authorized by the relevant body within Profonanpe.
- i. To move to or deliver at unauthorized locations any documents classified as secret, reserved or confidential, and generally any information not in the public domain, including information contained in magnetic media.
- j. To disseminate, transmit or diffuse all or part of the contents of the information which is or has been acquired in the course of their duties or the performance of contracted services, unless it is publicly known information or by court order.
- k. To give false testimony of any nature against the officials, appointees and / or coworkers in general, regardless of their hierarchy, and disseminate such testimony thereby disturbing the organization's labor peace and harmony.
- l. No employee of Profonanpe, hired full or part time, or under special conditions in return for remuneration, whatever the legal status or form of their contract, may receive from another person, institution or company any fees for accomplishing the same objective

or under the same terms of reference for which the employee was hired by Profonanpe. No Profonanpe employee shall be engaged simultaneously as a consultant with Profonanpe.

- m. Carrying weapons of any kind into Profonanpe facilities without permission from the competent authority and / or relevant functional unit is forbidden.
- n. Providing false information, and alter, modify or destroy work documents, to the detriment of Profonanpe.

## 6.2 The following are considered serious offenses:

- a. Profonanpe's employees who have access to information relating to internal affairs and / or accounting, taxation, labor, or contracts and, in general, information of the institution and other documentation that requires their discretion and confidentiality, whether in hardcopy or computer; and uses, handles, supplies or omits such information or other acts, in favor of third parties deriving a benefit, whether as gifts, favors, money or in any other form.
- b. Sponsorship, representation, advice or service by Profonanpe employees to others in return for gifts, favors, money or other benefits for themselves or others.
- c. Removal, mutilation, distortion, disposal or destruction by Profonanpe employees of documentation in general that is under their custody of Profonanpe. This offense also applies to staff whose relationship with Profonanpe has ceased.
- d. Introduction of reports, affidavits, representations, letters or any other document that is untruthful, omits or distorts information, and accuses or generates errors for the management of Profonanpe.
- e. Deception or falsification of information in order to obtain paid or unpaid license from work.
- f. In tenders by Profonanpe as part of its regular course of business and to manage, handle and / or execute its various projects, Profonanpe's employees' showing preference or awarding privileges, interceding for any bidder or person, altering information, making comments about or appraising proposals below or above cost, or engaging in any act favoring participants, bidders, or their relatives by blood or affinity, or any related third parties in exchange for gifts, favors or other benefits.
- g. Use, disposal or appropriation by Profonanpe's employees, whether effectively or not, of any goods or services in Profonanpe's custody, and the retention or misuse thereof, for their own benefit or that of others, regardless of their value, and to the detriment of Profonanpe.
- h. Abuse of their position as directors, managers, assistant managers, functional team leaders or immediate supervisors or other hierarchical position over other Profonanpe employees in the performance of their duties, and engage in acts of denigration, discrimination, or any other type of discriminatory treatment that affects the dignity of the employee or worker, regardless of their hierarchy or rank in Profonanpe's organizational structure.
- i. Hiding and failure to report offenses, crimes or violations to this Code of Ethics to their superiors or appropriate authorities.
- j. Engaging in other behaviors that contravene the prohibitions contained in section 6.1 of this institutional Code of Ethics, and as a result, seriously affect Profonanpe's image or its functions.



## CHAPTER VII

### SANCTIONS AND PROCEDURES

1. All Profonanpe employees and workers must comply with the provisions of this Code and therefore must remain informed of its contents and any subsequent amendments issued by the organization's Executive Director.

2. Infringement of the ethical duties and the prohibitions introduced by this Code are considered as a violation and creates a liability subject to sanctioning of Profonanpe's employees or workers within the scope of applicable labor regulations.

#### 3. Sanctions:

##### 3.1. For regular workers:

- a) Warning.
- b) Suspension. Temporary suspension from the exercise of duties or office, without pay, pursuant to the Internal Work Regulations of Profonanpe.
- c) Dismissal, subject to verification of the seriousness of the offense, pursuant to labor laws in force in Peru. To this end, the provisions of the Internal Work Regulation, applicable to workers of Profonanpe and other applicable laws will be enforced.

If in case signs or acts of corruption during the execution of expenses or recruitment processes Profonanpe detects, or receives any sort of report regarding alleged dishonest acts from its hired personnel, it will begin an investigation to resolve the veracity of the report, protect the institution's reputation, mitigate the consequences and correct the controls. If the allegations or reports are proven true, it will immediately proceed according to legal and work regulations, and will dismiss the personnel involved.

3.2. In the case of suppliers / consultants, who have no employment relationship with Profonanpe, and who fall within the scope of this Code, the penalties and responsibilities under the respective contracts shall apply, without prejudice to any action for damages for partial, late or defective delivery attributable to the supplier / consultant hired, pursuant to Peru's Civil Code.

3.3. If the offender no longer holds any relation with Profonanpe, the penalty will be those resulting from the corresponding actions for damages filed pursuant to Peruvian law.

##### 3.4. Sanctioning will take into consideration the following criteria:

- a) The harm to the institution.
- b) Impact on organizational procedures.
- c) Nature of duties performed and the position and rank of the offender.
- d) The benefit to the offender.
- e) The recurrence or repetition of the offense.

3.5. Sanctions will apply to all Profonanpe staff, whatever type of contract they have, and in accordance with the provisions of Peruvian Law (Supreme Decree 003-97-TR, Single Conformed Text of Legislative Decree 728, Productivity and Competitiveness Law), who commit offenses

established in this Code, for which the rules laid down in the above-mentioned law and labor regime, applicable to their position or role.

As such, the breach of the principles, obligations and other provisions set forth in this document by an employee shall constitute breach of his or her express labor obligations generating breach or violation of good faith principles at work and therefore empowering Profonanpe as employer, after pursuing the formalities of law, and the rule set forth in paragraph 3.1 above, to terminate the employment contract or employment relationship for serious misconduct under Articles 16, paragraph g) and 25 paragraph a) of Supreme Decree 003-97-TR in force (Productivity and Competitiveness Law) or any applicable future regulations.

The following legal regulations will also apply, as appropriate.

#### 4. Sanctions registration:

4.1 The sanctions mentioned in this Code of Ethics, the Institutional Operations Manual and / or the Internal Labor Guidelines, and applicable labor legislation, and depending on the seriousness of the offense, will be informed to the employee or worker, verbally, and / or in writing through internal memorandum, and / or through a notarized letter sent by the legal representative of the institution, i.e. the Executive Director if appropriate and necessary, and recorded in the personal files of the sanctioned employee. Also, to be taken into account are the procedures set out in the Internal Working Guidelines applicable to Profonanpe personnel.

#### 5. Whistleblowing:

5.1. All officials, staff, consultants and in general all persons and / or suppliers providing services in and for Profonanpe, whatever their working arrangements, type of contract and / or funding source, including persons employed for the rendering of services for specific jobs at the request of the institution and / or its different projects, and for which they provide their professional services under the various activities or tasks scheduled in each case, among others, have the obligation and duty to report, verbally and / or in writing, where appropriate, without delay, any alleged wrongdoing or improper conduct that they become aware of during the performance of their duties or contracted services, as appropriate, to the Executive Director of Profonanpe.

#### **What to do in case of doubt or a situation of conflict of interests?**

5.2. In case a situation of conflict of interests presents, potential or real, which may contravene or transgress the direction to prevent the conflict of interests contemplated in Profonanpe's Operations Manual, or in this Code of Ethics, it should be immediately reported to Profonanpe as it follows:

#### **In case is an employee or personnel hired by Profonanpe:**

5.3. If is an employee from Profonanpe, it should be reported in writing to his or her immediate superior to that there can be timely applied the preventive or corrective pertinent measures.

5.4. In case the report is not attended or resolved by his or her superior, it can be written down and sent directly to Profonanpe's Administration and Finances Direction.

5.5. If it is a consultant and / or supplier hired to lend professional services and / or in general, any person who lends services to Profonanpe, must report the incident by writing and directly to Profonanpe's Administration and Finances Direction.

5.6. In case a report is not attended or resolved by his or her superior, it can be written down and sent directly to Profonanpe's Executive Direction.

#### **In case is a person external to Profonanpe**

5.7. The reports that are presented by third parties to Profonanpe, could be done directly through the institutional website (in this case, the reports are received by a member of the Audits Committee directly to his or her email account). In this case, to do the corresponding report, the complainant must fill the report format available at Profonanpe's website, stating his or her name and address, so that he or she can be contacted to provide an answer to the report once the investigation is concluded.

#### **6. Regarding the Procedures:**

6.1. The Executive Director of Profonanpe, depending on the degree of wrongdoing or misconduct recorded, will refer the denunciation to the appropriate authorities (Department of Finance Administration, DAF and / or Department for Development and Supervision, DDS) within Profonanpe, so that they conduct the appropriate inquiries and investigations, and follow up the people involved in such acts potentially liable sanctioning.

6.2. Both departments, or each one separately where appropriate, should send a written report to the Executive Director of the institution reporting the results obtained pursuant to paragraph above, based on requests for reports sent to the people accused of wrongdoing or liable to sanctioning, evaluating the evidence presented and the disclaimer by the accused or involved parties.

6.3. DAF and DDS shall make appropriate recommendations, including the type of sanction to be applied in accordance with the seriousness of the act committed.

6.4. In case of minor offenses, DAF and the DDS shall proceed to sanction offenders according to the internal procedures established in the organization's Internal Work Manual (applicable to Profonanpe personnel) and its Manual of Operations, respectively.

6.5. In case of serious violations, the legal representative will file the appropriate complaints pursuant to law, before the appropriate authorities (Ministry of Labor, Police, Judiciary, etc.), and in case of criminal acts, and the provisions of Supreme Decree 003-97-TR and the Regulations thereunder shall apply to all personnel. All information concerning this administrative process will be maintained under strict reserve to protect its confidentiality.

6.6. DAF and / or DDS, jointly or separately, as appropriate, shall request to include in the above described administrative process, other workers or employees, when there is evidence of responsibility for the events under investigation, so that an Ad-Hoc Committee is set up, taking into consideration the hierarchy of the defendant at fault.



6.7. The Administration and Finances Director or the Executive Direction will inform the member of the Audit Committee, (in charge of receiving the reports or complaints) the investigation results, or by his or her requirement to keep him or her informed.

7. Whistleblower protection:

7.1. The complainant may request his or her identity is kept private.

7.2. Any Profonanpe employee or worker who speaks out is protected against employer retaliation, especially sanctions, termination or dismissal, as well as acts that could be considered hostile.

7.3. Any official contravening the provisions of this Article shall be sanctioned pursuant to applicable labor provisions.

7.4. When filing a complaint with the Profonanpe's Executive Direction, the complainant may request that his or her identity not be disclosed until the end of the investigation and where appropriate, the relevant disciplinary procedure. This information is considered confidential and its disclosure is punishable under this Code of Ethics.

7.5. Whistleblower protection does not apply to:

- a) Personnel or disciplinary procedures or wrongdoing that occurred before the filing of the complaint.
- b) Complaints filed in bad faith or without evidence or proof of facts alleged.

7.6. Whistleblowers are not protected:

- a. When the inquiries and investigations involve the complainant in the events that caused the complaint.
- b. When evidence of commission of a crime or wrongdoing results in an administrative procedure, and authorities press charges against the whistleblower.
- c. When wrongdoing, fraud or crime deserving labor or criminal sanctions as applicable, is effectively demonstrated, pursuant to laws in force in Peru.

8. A Profonanpe employee accused of allegedly committing a misdemeanor or felony, must provide appropriate disclaimers and carry out the administrative and / or judicial measures needed to protect his / her honor and dignity of his / her position.

## CHAPTER VIII

### ENCOURAGEMENTS AND INCENTIVES

Profonanpe's Executive Direction through DAF and / or DDS is responsible for proposing for adoption, incentives and encouragement to employees and workers who excel in complying with this Code, such as memos or congratulatory letters (that will be included in the dossier of the worker), and others approved by the Executive Director as recommended by DAF and / or DDS.

Congratulations and awards will be taken into account for purposes of performance evaluations and training, in accordance with existing regulations and Profonanpe policies.

## CHAPTER IX

### FINAL PROVISIONS

**FIRST.-** Profonanpe's Executive Direction, through DAF and DDS, will encourage a culture of probity, transparency, justice and service integrity.

**SECOND.-** All Profonanpe employees and workers, whatever their private labor regime, will receive a copy of the Code of Ethics and they will sign a statement confirming having read these rules and accepting to abide by them. This rule also applies to new employees or workers.

**THIRD.-** The Code of Ethics will be published in Profonanpe's corporate server.

**FOURTH.-** In order to monitor the compliance of the Code of Ethics, and the obligations that derive from it, as well as the guidelines to prevent a Conflict of Interest, the Administration Area (personnel), from the Administration and Finances Direction will be in charge of this task, according to the following:

- a. Will put at disposition of all of Profonanpe's employees, through the internal server, information related to this guidelines and institutional dispositions so that the personnel has permanent access and knowledge of them and its updates.
- b. Will include in the respective contracts, fixed-term and/or undetermined, if it applies the corresponding clauses for the fulfillment of institutional guidelines and dispositions.
- c. Will verify that the Acquisitions and Contracts Area considers the inclusion of the clauses previously mentioned applied in the personnel contracts, so that the contracts for professional services and/or consultancies, contests and/or public tenders etc. that this area has the responsibility to prepare, include the obligation to know and fulfill all the scope and aspects related to the Code of Ethics and the obligations that may derive from it, as well as the guidelines to prevent a Conflict of Interests.
- d. The "No Conflict of Interests Sworn Statements" formats, duly signed by Profonanpe's employees, will be a part of their personal file.
- e. The formats should be also signed by each supplier and/or consultant or person lending services to Profonanpe, as a mandatory and determining requirement to sign a services contract with Profonanpe. The follow up and fulfillment of this disposition will be in charge of Profonanpe's Acquisitions and Contracts Area, and the document will be part of its contracting file.
- f. Will verify through periodical evaluation that Profonanpe's employees, consultants / suppliers hired to lend professional services and in general every person that lends services to Profonanpe, to know the Code of Ethics and the obligations that derive from it, as well as the guidelines to prevent a Conflict of Interests. The correct understanding and dissemination will be evaluated annually.

**FIFTH.-** This Code of Ethics will be amended when changes in the laws so require, and when appropriate or necessary for Profonanpe's institutional purposes, in coordination with DAF and DDS, and with the authorization and knowledge of Profonanpe's Executive Director.



GREEN  
CLIMATE  
FUND



ADAPTATION FUND

**SIXTH.-** For all matters not covered in this Code of Ethics, the legal rules mentioned in Chapter II Legal Grounds above shall apply.

*Version updated in December 2018.*