



ANTI-BRIBERY POLICY

At LEARNING & LANGUAGE SERVICES S.R.L., we are firmly committed to fighting bribery in any form, by establishing principles, policies and procedures that guide the behavior of all our employees and business partners.

At LEARNING & LANGUAGE SERVICES S.R.L. **WE EXPRESSLY PROHIBIT** any form of bribery, at any level, whether directly or indirectly, involving public officials or bodies or private persons or organizations, as well as any type of behavior or action that may involve a violation of the current law on bribery.

This ANTI-BRIBERY POLICY reflects that our organization has and permanently exposes a high commitment to the development of our activities with an efficient level of ethics, integrity and **COMPLYING WITH THE CURRENT LAW.**

This ANTI-BRIBERY POLICY applies to all members of LEARNING & LANGUAGE SERVICES S.R.L., located at Av. José Pardo 434, Oficina 201, Miraflores. Lima, Perú, in the course of its business of **TRANSLATION AND INTERPRETATION IN MORE THAN 30 LANGUAGES IN DIFFERENT MODALITIES DEFINED IN THE LEGISLATION GOVERNING PROFESSIONAL PRACTICE AND ALL SUPPORTING ACTIVITIES.**

At LEARNING & LANGUAGE SERVICES S.R.L., we identify and periodically evaluate the bribery risks to which our activities are exposed, documenting the results in our risk matrix. **WE ESTABLISH** control and monitoring plans of our risks; **REVISED**, analyzed and evaluated, with the clear **OBJECTIVE** of preventing and reducing the chances of their occurrence.

The management of LEARNING & LANGUAGE SERVICES S.R.L. has approved this POLICY and **UNDERTAKES** to have the necessary resources and mechanisms for the proper implementation of an anti-bribery management system aligned with the **REQUIREMENTS OF INTERNATIONAL STANDARD ISO 37001:2016** in the course of our business, in order to prevent, control and manage any bribery risk to which our company may be exposed.

Any member of our organization, employee, partner, shareholder, manager, representative and/or person acting under authorization in the name or on behalf of LEARNING & LANGUAGE SERVICES S.R.L. is obliged to inform and/or report any action, conduct, information or evidence that is susceptible or suspected of violating this POLICY or the requirements of the ANTI-BRIBERY MANAGEMENT SYSTEM of our organization and that may involve criminal conduct by action or omission.

At LEARNING & LANGUAGE SERVICES S.R.L. we have arranged communication channels so that anyone may report any event or suspicious conduct or may share doubts or make queries on that regard, to include:

- E-mail address canaldenuncias@lls.com.pe
- Registration of communications through the secure CANAL DE DENUNCIAS offered by our organization on the website of our company: www.lls.com.pe

Responsible: Compliance Officer	Revised by: Mary Ann Elsa Monteagudo Medina	Document name: Anti-Bribery Policy	Page 1 of 2	July 12, 2022
------------------------------------	---------------------------------------------------	---------------------------------------	-------------	---------------



At LEARNING & LANGUAGE SERVICES S.R.L. **WE POSITIVELY VALUE AND STRONGLY ENCOURAGE THE COMMUNICATION (IN GOOD FAITH OR ON THE BASIS OF A REASONABLE BELIEF) OF ANY CONSULTATION, INDICATION OR SUSPICION OF VIOLATION OF THE LAW** by any member, person or organization linked to our organization, so we appreciate the greatest possible details in the statement of the facts reported and/or communicated.

Our organization has put in place secure internal mechanisms and processes to ensure the **CONFIDENTIALITY** of the complaints and communications received, as well as to protect from any kind of threat, coercion or **REPRISALS** to the persons who participate in our efforts to fight bribery through communication and denunciation.

As a result of the internal and external evaluation mechanisms of our anti-bribery management system, as well as based on the information collected, analyzed and evaluated, we have established control and supervision measures, committing ourselves to **CONTINUOUSLY IMPROVE** the effectiveness of our SGAS [Anti-Bribery Management System].

We have designated a specific position within our company, the **COMPLIANCE OFFICER**, endowed with capacity, autonomy, **INDEPENDENCE AND AUTHORITY**, to ensure the correct design, implementation, monitoring and improvement of our anti-bribery management system. The Compliance Officer is available to all members of our organization to advise, guide and support them in ethical performance and compliance.

We count with a code of conduct in force and approved by the Senior Management. Our code of conduct, as well as the **DISCIPLINARY CONSEQUENCES FOR ITS BREACH**, are applicable to all members of LEARNING & LANGUAGE SERVICES S.R.L. notwithstanding the legal consequences that may fall on them for those acts, facts or behaviors that involve a violation of the law. In this sense, we have a disciplinary system to sanction conduct contrary to the provisions of this POLICY, our code of conduct, and our ANTI-BRIBERY MANAGEMENT SYSTEM.

General Management
Lima, July 12, 2022

ELSA MEDINA DE MONTEAGUDO
REPRESENTANTE LEGAL

Responsible: Compliance Officer	Revised by: Mary Ann Elsa Monteagudo Medina	Document name: Anti-Bribery Policy	Page 2 of 2	July 12, 2022
------------------------------------	---------------------------------------------------	---------------------------------------	-------------	---------------