



TALENTS FOR DEVELOPMENT



CODE OF CONDUCT

December 2025
Second version

Message from the General Manager



Dear colleagues and strategic partners: This Code of Conduct reflects our values and guides our daily decisions. Adherence to it is essential to maintaining integrity, transparency, and trust that define our organizational culture.

Sincerely,

A handwritten signature in blue ink, reading "A. Medrano Paucarcaja". The signature is stylized and written on a white background.

Adolfo Medrano Paucarcaja
General Manager

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1. Objective

To establish ethical and conduct standards to protect the firm's reputation, guarantee service quality, and guide decision-making.

2. Scope

This applies to all partners, directors, consultants, advisors, administrative staff, and contractors of the firm, regardless of the country or work arrangement.

3. Principles and Values

3.1 **Integrity:** Acting with honesty and consistency between words and actions.

3.2 **Respect:** Valuing the dignity, diversity, and opinions of each person, fostering an inclusive environment.

3.3 **Diversity:** A strategic driver for innovation, productivity, organizational sustainability, talent satisfaction and retention, and strengthening the corporate reputation.

3.4 **Honesty:** A commitment to act with transparency, truthfulness, and integrity in all decisions and communications, ensuring that shared information is truthful and complete.

3.5 **Loyalty:** The commitment, dedication, and fidelity that employees demonstrate toward the firm and its objectives. This emotional connection motivates employees to act responsibly, support the organizational mission, and remain with the company over time.

3.6 **Ethics:** A set of values, principles, and standards that guide the behavior of all individuals within a company, defining right and wrong and guiding decisions toward fair and equitable practices in the business environment.

3.7 **Transparency:** This involves making relevant, truthful, and accessible information about the company's policies, practices, and results available to all stakeholders, ensuring consistency between what is communicated and what is practiced.

3.8 **Confidentiality:** A principle that guarantees that sensitive information, whether personal, financial, or strategic, is protected and only accessible to those authorized to know it.

3.9 **Excellence:** A company's ability to achieve and maintain outstanding levels of performance in all its areas, exceeding the expectations of customers, employees, and other stakeholders. It implies a systematic approach to continuous improvement, quality, and strategic alignment with business objectives.

3.10 **Innovation:** Introduction of new human resource management methods, routines, and procedures, as well as changes in the business model, operational structure, and strategic alliances to optimize resources and generate sustained value.

3.11 **Sustainability and Social Responsibility:** Sustainability is the balance between human activities and environmental resources to ensure their long-term availability, and social or corporate responsibility is the voluntary obligation of organizations to contribute to social and environmental well-being beyond legal compliance, integrating ethical values into their management and decision-making.

4. Code of Conduct

These codes of conduct apply to all partners, directors, consultants, advisors, and administrative staff, regardless of the country or work arrangement. They include the following:

- Legal compliance: adhering to laws, regulations, and internal policies.
- Conflict of interest: disclosing relationships or activities that could affect impartiality.
- Responsible use of resources: using the organization's assets responsibly.
- Health and safety: promoting a safe and healthy work environment.
- Diversity and inclusion: fostering respect for the diversity of ideas, cultures, and genders.

5. Reporting Procedure

To establish a reporting procedure that guarantees the confidentiality and security of the whistleblower, the organization has established the following:

5.1 Responsible Parties

- **Ethics Committee:** comprised of the General Manager, team leaders, and a representative of the employees, oversees the process and ensures impartiality.
- **Compliance Officer:** receives, registers, and coordinates investigations.
- **Human Resources Department:** participates in follow-up and provides technical and legal support.

5.2 Reporting Channels

Channel	Description	Availability
Internal web platform	Intranet form with authentication	24 hours a day, 7 days a week
Email	etica@talentsfordevelopment.com	Monday to Friday from 9 a.m. to 6 p.m.
Confidential physical mailbox	Located in the human resources area	Office Hours

5.3 Process Flow

a. Reception and Registration

- The Compliance Officer receives the complaint and assigns a unique case number.
- Time limit: 1 business day from receipt.

b. Preliminary Review

- The complaint is verified to ensure it contains the minimum required information: description, dates, and individuals involved.
- It is assessed whether a formal investigation is required or if the complaint should be filed as inadmissible.

- Time limit: 3 business days.

c. Investigation

- An internal or external investigator is assigned.
- Evidence is gathered: interviews, documents, and electronic records.
- Time limit: 15 business days (extendable with justification).

d. Analysis and Decision

- The Ethics Committee reviews the report and determines corrective actions or sanctions.
- Deadline: 5 business days after the investigation is closed.

e. Communication of Results

- The complainant (if known) and the alleged offender are notified, ensuring privacy.
- The measures taken and compliance deadlines are documented.
- Deadline: 3 business days after the decision.

f. Follow-up and Closure

- The Compliance Officer verifies the implementation of the measures.
- The file is archived with a report of lessons learned.
- Deadline: 30 days after the communication of results.

g. Confidentiality and Protection

- All complaints are managed with strict confidentiality.
- The complainant remains anonymous and is protected against retaliation.
- Identities and evidence are only shared with individuals directly involved in the investigation.

h. Appeals

- Any party may appeal to the Ethics Committee, submitting new background information or evidence.
- Appeal period: 10 business days from the notification of the results.
- The Committee will resolve the appeal within a maximum of 10 additional business days.

i. Sanctions

The scale of sanctions is as follows:

- Level 1: Verbal/written warning
- Level 2: Suspension, mandatory training
- Level 3: Termination of employment or contract

6. Conflicts of Interest

To maintain transparency in our business relationships with clients, we consider the following:

- Before undertaking a project, we assess potential conflicts of interest with current or past clients.
- If a conflict is identified, we immediately inform the company's Ethics Committee.
- We refrain from participating in decisions that could compromise impartiality.

7. Data Protection and Privacy

To ensure the proper use of information, we consider the following measures:

- Technical: encryption in transit and at rest; backups; multi-factor authentication; access control and incident monitoring.
- Organizational: privacy policies, staff training, privacy impact assessments, contracts with suppliers, and breach response plans.
- Transparency: informing users about what data is collected and why and providing mechanisms to exercise their rights.

8. Use of Technology and AI

To develop various activities involving the management of advisory and consulting services, the following is considered:

- Transparency in the use of AI for selection or evaluation; validating biases and documenting automated decisions.
- Prohibition of practices that violate the dignity or privacy of individuals.

9. Anti-Corruption and Gifts

To reduce the risks of corruption, the following is considered:

- Zero tolerance for bribery; clear limits on gifts and business favors.
- Registration and approval of favors that exceed defined thresholds.

10. Workplace Conduct

Talents for Development consider the following aspects:

- Policies on harassment, substance use, safety, and working hours.
- Promotion of well-being and work-life balance.

11. Competence and Professional Development

At Talents for Development, we provide excellent services to our clients. Therefore, our organization is committed to:

- Maintaining up-to-date certifications, licenses, and knowledge through continuous training.
- Sharing best practices and lessons learned internally.
- Not accepting projects for which we lack proven technical expertise.

12. Respect, Diversity, and Inclusion

At Talents for Development, we believe that all people are equal. For this reason, we:

- Foster an environment free of harassment, discrimination, and microaggressions.
- Support affinity groups within the firm and collaborate on inclusive education initiatives.
- Adapt our work methods to diverse cultural, generational, and skill-based needs.

13. Compliance with Laws and Regulations

Our human resources advisory and consulting services are guaranteed by:

- Understanding and applying labor, data protection, and professional consulting legislation in each country.
- Advise clients regarding current legal frameworks and pointing out risks of non-compliance.

14. Detection and Reporting Mechanisms

We ensure the safety of our staff and strategic partners from practices that violate the principles and values established by our organization, as follows:

- Anonymous internal channels for reporting conduct that violate the Code.
- An Ethics Committee that analyzes, investigates, and recommends corrective actions.
- Protection of whistleblowers from retaliation.

15. Sanctions and Consequences

Our organization has established the levels of infractions that may be committed by employees in the performance of their duties, as follows:

Level of Infraction	Disciplinary Action
Mild	Verbal or written reprimand
Moderate	Suspension, compulsory training
Serious	Termination of contract, possible legal action

16. Implementation and Monitoring

Our organization's Human Resources department is responsible for the following actions:

1. Internal Communication: Presentation of the Code at kick-off meetings, on the intranet, and in the employee handbook.
2. Mandatory Training: Biannual workshops on ethics, internal data protection (EDP), and privacy.
3. Periodic Audits: Annual compliance reviews and employee satisfaction surveys.
4. Ongoing Review: Updating the Code every 12–18 months based on regulatory changes and lessons learned.

17. Appendices

- a. Anti-Fraud Policy
- b. Anti-Discrimination Policy
- c. Complaint Form

17.1 Anti-Fraud Policies

1. Objective

The objective of the anti-fraud policy is to strengthen a culture of prevention, detection, and zero tolerance for illicit and unethical acts, guaranteeing responsible behavior from all employees within the framework of our Code of Conduct.

2. Scope

This policy applies to all employees, managers, contractors, suppliers, and third parties who interact with the organization, both in internal and external activities, during and outside of working hours.

3. Definitions

Term	Definition
Fraud	Deliberate act to obtain an undue benefit, through deception or manipulation of information or assets.
Bribery	Offering or giving money or advantages to unduly influence decisions of a public or private official.
Corruption	Abuse of power for personal gain, violating the law and affecting the general interest.
Conflict of interest	A situation in which personal interests may interfere with professional or organizational duty.
Risk of fraud	Probability of a fraudulent event occurring based on the analysis of vulnerabilities and existing controls.

4. Roles and Responsibilities

- Board of Directors
- Approve and review the anti-fraud policy annually.
- Senior Management
- Promote a culture of integrity and ensure resources for its implementation.
- Compliance Officer
- Coordinate risk assessments, oversee controls, and lead investigations.
- Employees

- Understand and comply with policies, report incidents, and cooperate in investigations.
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5. Prevention

- Conduct periodic fraud risk assessments to identify vulnerable areas.
 - Establish internal controls (segregation of duties, approval limits, asset custody).
 - Implement confidentiality agreements and anti-fraud clauses in contracts with third parties.
 - Incorporate integrity criteria into hiring and promotion processes.
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6. Detection and Reporting

- Monitor key transactions and activities using automated alert systems.
 - Provide confidential, anonymous, and non-retaliation-free reporting channels:
 - Intranet form available 24/7
 - Dedicated email address
 - Telephone line with recording system
 - Secure physical drop box
 - Foster a culture of initiative-taking reporting and whistleblower protection.
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7. Investigation and Sanctions

1. Reception and Registration

- Assignment of a unique case number

2. Preliminary Analysis

- Verification of minimum data and decision on formal investigation.

3. Investigation

- Collection of evidence (interviews, documents, records).
- Standard time limit: 15 business days, extendable with justification.

4. Decision and Sanctions

- The Ethics Committee determines corrective actions: warning, suspension, or termination.

5. Communication

- Notification to the parties involved guaranteeing confidentiality.
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8. Monitoring and Control

- Quarterly reviews of key indicators: number of reports, response time, and completion rate.
- Internal and external audits to evaluate the effectiveness of controls.
- Updating of the risk assessment and procedures based on findings.

9. Training and Communication

- Annual fraud prevention and ethics training program for all levels.
 - Training materials (case studies, quick guides) available on an internal platform.
 - Awareness sessions for leaders on identifying red flags and incident management.
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10. Policy Review

- The policy will be reviewed at least annually or in response to regulatory or organizational changes or following significant incidents.
- Responsible for the review: Compliance Officer in coordination with the Ethics Committee.

17.2 Anti-Discrimination Policies

1. Objective

To establish a framework that guarantees equal treatment and respect for the dignity of all people, preventing, sanctioning, and eradicating any form of discrimination in the workplace.

2. Scope

This policy applies to all employees, managers, contractors, suppliers, visitors, and third parties associated with the organization, both on-site and at events, through digital channels, and in external activities.

3. Definitions

Term	Description
Discrimination	Any distinction, exclusion, or preference based on race, sex, age, religion, sexual orientation, disability, ethnic origin, etc.
Workplace and sexual harassment	Unwanted verbal, non-verbal, or physical conduct that seeks to intimidate, humiliate, or violate a person's dignity in the workplace
Inclusion	Actions and practices that guarantee full participation, representation, and access to opportunities for all groups, without distinction
Historically discriminated groups	Communities or people who have systematically suffered social exclusion or denial of basic rights (e.g., Indigenous people, Afro-descendants).

4. Principles

- Equal opportunities: fair treatment in recruitment, development, and promotion.
 - Non-discrimination: zero tolerance for prejudice based on any personal attribute.
 - Respect for diversity: recognition of the value contributed by different perspectives.
 - Protection of rights: compliance with constitutional and international norms that protect vulnerable groups.
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5. Guidelines for conduct

- Refrain from comments, jokes, or expressions that reinforce negative stereotypes.
 - Use inclusive and respectful language, avoiding derogatory terms.
 - Ensure physical and technological accessibility for people with disabilities.
 - Facilitate reasonable adjustments (schedules, tools) to meet special needs.
 - Promote safe spaces where anyone can report experiences of discrimination without fear.
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6. Roles and responsibilities

- Senior Management: lead by example and allocate resources to implement this policy.
 - Compliance Officer / HR Human Resources: Disseminate, monitor, and update anti-discrimination measures.
 - Team Leaders: Intervene in cases of inappropriate behavior and ensure inclusive environments.
 - All employees: Respect the rules, report incidents, and support diversity initiatives.
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7. Reporting Mechanisms

- Confidential and anonymous channels (intranet, email, telephone hotline, physical drop box).
- Immediate reception by a specialized committee, with a guarantee of no retaliation.
- Streamlined investigation process: case registration, interviews, analysis, and closure with corrective measures.

8. Sanctions

1. Verbal or written reprimand.
2. Temporary suspension and mandatory sensitivity training.

3. Termination of employment or contractual relationship, depending on the severity and recurrence of the offense.
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9. Training and Awareness

- Annual training program on diversity, inclusion, and discrimination prevention.
 - Interactive workshops with real-life case studies and role-playing exercises.
 - Reference materials (guides, infographics) available on the intranet.
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10. Policy Review

The policy will be evaluated and updated at least once a year or in response to regulatory changes, incident reports, or internal audit results. Responsible: Compliance Officer in coordination with the Ethics Committee.

17.3 Conduct Report Form

Instructions

Please complete all fields as accurately as possible. This form is confidential and protected by the no-retaliation policy.

1. Report Detail

Field	Detail
Case number	
Date and time of the report	
Complainant (the one who reports)	Full name and area
Position and department	
Contact	Email address and/or extension
Anonymity	Yes [] No []

2. Information about the Alleged Offender

Field	Detail
Name	
Position and department	
Area or headquarters	

3. Location and Context

- Exact location of the incident:
- Date and time of the incident:
- Prior circumstances:

4. Description of the Incident

Describe in detail what happened, including relevant facts, words, gestures, or attitudes. Include dates, times, and any context that provides clarity.

5. Type of Conduct (check all that apply)

- ☐ Harassment or discrimination
 - ☐ Fraud or embezzlement
 - ☐ Breach of confidentiality
 - ☐ Conflict of interest
 - ☐ Misuse of resources
 - ☐ Other (specify): _____
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6. Witnesses and Evidence

- Witness 1: Name, position, and contact information
 - Witness 2: Name, position, and contact information
 - Attached evidence: (documents, emails, photos, recordings, etc.)
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7. Immediate Actions

Details if preliminary measures have been taken to mitigate the impact (e.g., temporary separation of areas, safeguarding of evidence, notification of supervisor).

8. Follow-up Proposal

If you deem it necessary, suggest actions or resources to support the investigation (e.g., additional interviews, systems audit, legal advice).

9. Signature

Signature of the whistleblower (or verification code): _____

Date of signature: _____

10. Confidentiality Notice

All information provided will be treated with strict confidentiality and will only be accessible to those responsible for the investigation process. No retaliation will be permitted against anyone who reports in good faith.