

CODE OF CONDUCT

2023

EXOMAD Code of Conduct

EXOMAD is committed to maintaining the highest standards of ethics and integrity in all our business operations. We recognize that our success depends on the trust and confidence of our clients, employees, and other stakeholders. To uphold this trust, we have developed this Code of Conduct that outlines our expectations for ethical and responsible behavior. This Code of Conduct applies to all employees, officers, directors, and contractors of EXOMAD. We expect everyone to understand, follow, and promote this Code of Conduct in their daily business activities. This Code of Conduct is not an exhaustive list of all the ethical and legal obligations that we have as a company, but it provides a framework for ethical and responsible decision-making. We encourage everyone to report any suspected violations of this Code of Conduct or any other ethical or legal violations to their supervisor or to our Human resources department. We will investigate all reports in a timely and confidential manner and take appropriate action to address any violations. We believe that by upholding this Code of Conduct, we will continue to earn and maintain the trust and confidence of our stakeholders.

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1. Honesty, Integrity and Transparency:

Honesty: We will be truthful and straightforward in all of our business dealings, and we will not misrepresent facts or deceive others.

Integrity: We will act with the highest level of integrity, which means that we will adhere to moral and ethical principles even when no one is watching. We will be accountable for our actions and take responsibility for any mistakes or errors.

Transparency: We will communicate openly and transparently with our colleagues, clients, customers, and other stakeholders. We will disclose any relevant information and be open to feedback and suggestions.

Overall, EXOMAD is committed to ensuring that our business operations are conducted in a manner that promotes the health, safety, security, and environmental responsibility of our employees, clients, stakeholders, and communities.

2. Child and Forced Labor:

EXOMAD is strictly against the use of child and forced labor in any of our operations or supply chains. We comply with all relevant laws and regulations, and we expect our suppliers to do the same.

3. Health, Safety, Security, and the Environment:

EXOMAD is committed to providing a safe and healthy work environment for all our employees, contractors, and visitors. We comply with all relevant health and safety laws and regulations and maintain proper controls and safeguards to prevent accidents, injuries, and illnesses. We also provide training and resources to our employees to ensure that they are aware of their obligations and responsibilities regarding health and safety.

EXOMAD is also committed to protecting the security of our employees, clients, assets, and information. We maintain proper controls and safeguards to prevent any unauthorized access, use, or disclosure of our assets and information. We also ensure that our employees are aware of their obligations and responsibilities regarding security.

EXOMAD recognizes the importance of environmental responsibility and sustainability. We comply with all relevant environmental laws and regulations and strive to minimize our environmental impact. We also seek to promote environmental responsibility and sustainability in our business operations and in the communities where we operate. We encourage our employees to take an active role in environmental responsibility and sustainability and provide training and resources to support their efforts.

4. Privacy and Third-party Confidentiality:

EXOMAD respects the privacy of our employees, customers, and partners. We collect and handle personal information in accordance with applicable laws and regulations. We also maintain strict confidentiality regarding third-party information and ensure that it is only used for legitimate business purposes.

5. Respectful, Harassment-free Workplace:

EXOMAD is committed to maintaining a respectful and harassment-free workplace. We do not tolerate any form of discrimination, harassment, or bullying based on race,

ethnicity, gender, sexual orientation, religion, or any other characteristic protected by law.

6. Money Laundering:

EXOMAD strictly prohibits money laundering and terrorist financing. We comply with all relevant laws and regulations and conduct proper due diligence on our customers, suppliers, and partners to prevent any illegal activities.

7. Working with Suppliers:

EXOMAD expects our suppliers to comply with our code of conduct and all applicable laws and regulations. We conduct proper due diligence on our suppliers and maintain open and transparent communication with them.

8. Competition and Antitrust:

EXOMAD is committed to fair competition and complying with antitrust laws and regulations. We do not engage in any anti-competitive behavior, including price fixing, market sharing, or monopolistic practices.

9. Gifts:

EXOMAD maintains a strict policy on giving and receiving gifts and entertainment to and from customers, suppliers, and other parties. We prohibit any gifts or entertainment that could create a conflict of interest, appear to influence business decisions, or violate applicable laws and regulations.

10. Bribery and Corruption:

EXOMAD strictly prohibits bribery and corruption in any form. We comply with all relevant laws and regulations and maintain a zero-tolerance policy towards any form of bribery or corruption.

11. Slavery and Trafficking:

EXOMAD is committed to eliminating all forms of slavery and human trafficking in our operations and supply chains. We require our suppliers to comply with all relevant laws and regulations and maintain proper due diligence to identify and prevent any risks of slavery and trafficking.

12. Governments and Communities:

EXOMAD respects the laws, regulations, and cultural norms of the countries where we operate. We also engage with local communities and stakeholders to ensure that our operations have a positive impact.

13. Community Engagement:

EXOMAD engages with local communities and stakeholders to understand their needs and concerns. We also support community development projects to promote sustainable development.

14. Political Activity:

EXOMAD respects the political rights of our employees, customers, and partners. However, we do not engage in any political activities that could create a conflict of interest or appear to influence business decisions.

15. Freedom of Association:

EXOMAD respects the right of our employees to associate freely and engage in collective bargaining. We comply with all relevant laws and regulations and ensure that our employees can exercise their rights without fear of retaliation.

16. External Communications:

EXOMAD maintains open and transparent communication with our customers, partners, and stakeholders. We ensure that all external communications are accurate, truthful, and do not mislead or deceive.

17. Dealing with Governments:

EXOMAD conducts all business with governments in an open, transparent, and ethical manner. We comply with all relevant laws and regulations and maintain proper due diligence to prevent any conflicts of interest.

18. Protecting Our Clients' Assets:

EXOMAD is committed to protecting the assets of our clients. We maintain strict confidentiality regarding our clients' information and ensure that it is only used for legitimate business purposes. We also maintain proper controls and safeguards to prevent any unauthorized access or use of our clients' assets.

19. Insider Trading:

EXOMAD strictly prohibits insider trading. We comply with all relevant laws and regulations and maintain proper controls and safeguards to prevent any unauthorized access or use of inside information. We also ensure that our employees are aware of their obligations and responsibilities regarding insider trading.

20. Intellectual Property and Copyright of Third Parties:

EXOMAD respects the intellectual property and copyright of others. We do not use or reproduce any copyrighted material without the proper authorization or permission. We also ensure that our employees are aware of their obligations and responsibilities regarding intellectual property and copyright.

21. Digital Systems Use and Security:

EXOMAD maintains proper controls and safeguards to ensure the security and integrity of our digital systems. We also ensure that our employees are aware of their obligations and responsibilities regarding the proper use and protection of our digital systems. We do not use or access any digital systems without proper authorization or permission.

22. Exomad Code of Conduct Reporting Guidelines

At Exomad, we take our Code of Conduct very seriously and are committed to upholding the highest standards of ethical and professional behavior. We encourage all employees, clients, customers, and other stakeholders to report any suspected violations of our Code of Conduct.

23. Reporting a Violation

If you become aware of a suspected violation of our Code of Conduct, we encourage you to report it to the Human Resources Department. You may report a violation in the following ways:

Email: Send an email to the Human Resources Department at hr@exomad.com. Please provide a detailed description of the suspected violation, including any relevant facts and evidence.

Phone: Call the Human Resources Department you may speak with a Human Resources representative who will guide you through the reporting process.

In-person: You may report a violation in person to a Human Resources representative. You can schedule a meeting by sending an email to hr@exomad.com

a. Anonymous Reporting

If you prefer to remain anonymous, you may report a violation through our anonymous reporting hotline. To access the hotline, please follow these steps:

Dial +591 33533003 int. 2234

Follow the prompts to leave a message.

Provide a detailed description of the suspected violation, including any relevant facts and evidence.

You will be given a case number that you can use to follow up on your report.

b. Protection Against Retaliation

We take all reports of violations seriously and will investigate each report in a timely and impartial manner. We will protect individuals who report suspected violations in good faith against any form of retaliation. If you believe that you have been retaliated against for reporting a suspected violation, please report this to the Human Resources Department immediately.