



ANTI-CORRUPTION & BRIBERY PRINCIPLES

At Inforlandia S.A., our unwavering commitment to ethical and anti-bribery standards mirrors the internationally recognized principles set forth in ISO 37001. We are dedicated to upholding the highest standards of integrity and compliance with anti-corruption laws and treaties in all regions where we conduct business. Our commitment is steadfast:

1. **Prohibition of Bribery:** Inforlandia S.A. strictly prohibits the offering or giving of anything of value to anyone, including government officials, to influence official action or secure an improper advantage, as defined by applicable laws.
2. **Scope of Government Officials:** We maintain a comprehensive view of "government officials" that encompasses government employees, candidates for public office, and employees of government-owned or controlled companies, public international organizations, or political parties. This ensures the broad applicability of our anti-bribery standards.
3. **"Anything of Value":** We categorically define "anything of value" to encompass a wide range of items, including cash or cash equivalents, gifts, meals, travel expenses, political or charitable contributions, and job offers to relatives of government officials. Our policy leaves no room for ambiguity in its expectations.
4. **Universal Applicability:** Our commitment extends across the entire spectrum of our organization, applying equally to Inforlandia S.A. employees and representatives, as well as our channel partners, agents, and third parties acting on our behalf. This commitment transcends geographical boundaries, ensuring a consistent ethical framework regardless of location.
5. **Non-Retaliation Guarantee:** In alignment with ISO 37001 principles, Inforlandia S.A. guarantees that no employee or representative will face any form of retaliation for refusing to participate in bribery or for declining a bribe or commission. We believe that principled behavior should be celebrated, even when it might result in the loss of business opportunities.

6. **Prohibition of "Facilitation" Payments:** Our firm stance against "facilitation" or "expediting" payments, as articulated in ISO 37001, is an integral part of our policy. We explicitly prohibit direct payments of any amount to public officials, directly or through third parties, to expedite routine non-discretionary governmental actions, such as visa processing, permit and license acquisition, police protection, courier services, or inspection scheduling related to contract performance.

GIFTS, ENTERTAINMENT, CORPORATE HOSPITALITY & TRAVEL

Inforlandia S.A.'s relationships with suppliers, customers and others must be based entirely on sound business decisions and fair dealing. Gifts for business, entertainment, and corporate hospitality can help build relationships, but they can also hinder the objectivity of the person or company providing them. Inforlandia S.A. employees or representatives may not:

- Solicit, offer, accept, or provide gifts, entertainment, corporate hospitality, or travel if it is required or appears to be binding on the recipient.
- Solicit, offer, accept or provide someone with cash or cash equivalents, luxurious or frequent gifts or entertainment, or anything that may appear to be a bribe.
- Provide or accept sexual orientation gifts or entertainment.

GIVING & RECEIVING GIFTS

Inforlandia S.A. employees or representatives may not offer or receive gifts from suppliers, customers or other business-related entities unless all of the following conditions are true:

1. Moderate value: This value varies from country to country. A cheap complimentary gift, such as a promotional item, has a "moderate value" anywhere. Contact the Commercial Department for guidance on which gifts may be accepted or offered.
2. Habitual and appropriate. The item is considered a customary and appropriate business gift in the country in which it is offered and offering or accepting it would not reflect damage to Inforlandia S.A. if the details were made public.
3. No treatment favored. The gift is not offered in the expectation of special or favored treatment.
4. Legal and approved. Offering or accepting the gift is legal at the place and under the given circumstances and does not violate the policies of the donor or recipient, and the donor and recipient have received appropriate approval to accept the gift.

ENTERTAINMENT & TRAVEL

With appropriate approval, business or entertainment amenities such as meals may be offered or accepted, provided that expenses are reasonable and not prohibited by law or by either party's policies or rules of conduct. Inforlandia S.A. employees or representatives must always obtain a pre-approval from their superior before accepting or offering any entertainment or travel gift to customers, suppliers, businesses or other third parties.

PROVIDING GIFTS, ENTERTAINMENT OR TRAVEL TO GOVERNMENT OFFICIALS OR EMPLOYEES

Laws on the giving of gifts, hospitality and travel to civil servants (which include executives and employees of state-owned companies, newspapers, television, universities and others) are complex and may vary from country to country. In many cases, it is illegal and improper to provide gifts to government officials. Special care is required in this highly regulated area as Inforlandia S.A. wishes to avoid the appearance of inconvenience.

Contact the Commercial Department for guidance on which gifts may be accepted or offered.

WHISTLE-BLOWING

At our organization, we recognize the critical importance of fostering an environment where ethical conduct and compliance with regulations are paramount. Our whistleblowing policy serves as a fundamental pillar of this commitment to integrity and accountability.

Employees are not only encouraged but also empowered to promptly report any violations of our codes of conduct, applicable policies, or potential breaches of laws and regulations. Additionally, any form of misconduct should be reported through established reporting channels. These channels and protocols have been diligently established to ensure that any questionable conduct is reported efficiently and addressed appropriately. Clear communication of these protocols is a priority for our organization.

Our whistleblowing policy is designed to be transparent and easily accessible to all individuals within the organization. Whether as a standalone policy or integrated within our broader Code of Conduct, the policy is structured to be clear, concise, and easily comprehensible to every member of our team.

Reports made through our whistleblowing channels are treated with the utmost confidentiality. We ensure that individuals reporting any violations or misconduct are protected from any form of retaliation. Non-retaliation is a core principle that underlines our commitment to maintaining an open and safe environment for reporting.

Reports of potential violations are diligently investigated, and appropriate corrective actions are taken. Our organization is committed to addressing reported concerns with the seriousness they deserve, ensuring a fair and just resolution.

Our whistleblowing policy remains subject to regular review and improvements. This ensures its effectiveness and alignment with evolving best practices and legal standards.

REINFORCED COMMITMENT

At Inforlandia S.A., our commitment to anti-bribery standards aligns with ISO 37001, reinforcing our dedication to ethical excellence and integrity in every facet of our business operations.

