



CODE OF ETHICS AND BUSINESS CONDUCT

The Veconinter's Code of Ethics and Business Conduct was developed as a guide for a competitive business conduct, socially responsible and honest, with the obligation to avoid situations that might contravene the provisions of this document.

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CODE OF ETHICS AND BUSINESS CONDUCT

1. Purpose

The purpose of Veconinter's Code of Ethics and Business Conduct is to orient our practices and efforts towards a business conduct which is socially responsible, honest, and competitive, with the obligation to avoid situations that might contravene the provisions of this document.

2. Scope

Our Code applies to all of Veconinter's personnel (whether permanent, occasional, temporary, contractual, at full or part time, etc.), advisers, representatives, and members, at any hierarchy level, including those of direction or confidence, and, generally, individuals related to the Company.

3. Diffusion

The diffusion hereof will be made through Veconinter's intranet and web page.

4. Mission, Vision, and Values

Mission

The offer of competitive services to the maritime industry on the basis of technological innovation, promoting the standardization of the rule amongst the users of intermodal equipment, through the experience of a human team, who is motivated and committed with the quality processes and the full satisfaction of the client.

Vision

To become a world of answers for the maritime industry, changing conducts.

Values

Our values keep us framed in an environment of professionalism and excellence. They represent the manner in which we handle our commercial relations, how we express, and how we interact with the interested parties, thereby inspiring trust and confidence.

- **Honesty.** Transparency in our service allows our clients to certify the rectitude of our management.
- **Responsibility.** We fulfil our service obligations and promises made.
- **Competitiveness.** This is one of the great attributes that prompt us to work in a constant, effective, and efficient manner.
- **Security.** We give our clients confidence through the solid and responsible knowledge in our management.
- **Team work.** Our commitment, confidence, and responsibility to achieve any propose objectives.
- **Respect.** We value the interests and thoughts of our personnel and clients.

- **Service Quality and Customer Support.** Our main objective is to serve our clients keeping high standards of quality and excellence, and achieve their total satisfaction.
- **Ethics and professionalism.** We are committed to making ethical decisions that increase our credibility as a company.

I. OUR COMMITMENT TO OUR CODE OF ETHICS AND BUSINESS CONDUCT

We are all committed to Veconinter's Code of Ethics and Business Conduct ("our Code"), which seeks to promote honesty and transparency in the conduct of our company and its commercial relations, as well as with any interested parties. Our Code may be consulted when so required through our intranet and web page.

1. Compliance with the Law

All our business activities must be carried out strictly in accordance with the laws and regulations of each of the countries in which we operate.

Should the local laws and regulations allow conducts which are not in accordance with our Code of Ethics and Business Conduct, the latter will prevail.

2. Code Regulations

The Code of Ethics and Business Conduct is a document of a global nature applicable to all official activities and businesses carried out by the Company and in all the areas our personnel are deemed to be its representatives. The failure to comply with our Code of Ethics and Business Conduct, its policies, and standard procedures, will give rise to disciplinary measures.

3. Our responsibilities

- To get to know, understand, and abide by the policies and guidelines contained herein, as well as the laws and rules applicable to our business.
- Report any violation, whether actual or apparent, of our Code of Ethics and Business Conduct, or its policies and standard operational, administrative, or support procedures.
- To act with honesty at all times, in order to maintain and promote the good reputation of the Company in all of our activities, wherever they might take place.

4. The commitment of our directors

Our directors are responsible for promoting a culture of compliance and honesty, and of guaranteeing a positive work environment, where people are treated with honesty and respect.

The directors must:

- act with respect and honesty and comply with the rules of Veconinter's Code of Ethics and Business Conduct;
- propitiate a work environment that stimulates our personnel to proceed in an ethical manner;
- be a resource for our personnel to become relative with the provisions of Veconinter's Code of Ethics and Business Conduct and strengthen them continuously;
- treat in an adequate and timely manner both their own concerns or those risen by our personnel with respect to ethical behaviour and regulatory compliance;
- comply with the established disciplinary measures when violations of an ethical and regulatory nature arise;

- modelling through example and being a reference as to the following of the Code of Ethics and Business Conduct, as well as being custodians of the principles contained herein.

5. Veconinter's commitment

Veconinter promotes honesty and the highest ethical principles in all the aspects of its activities. Accordingly, in order to guarantee that everyone respects the values and obligations set forth in our Code of Ethics and Business Conduct, Veconinter is committed to:

- creating and promoting a business culture;
- making the personnel aware about our Code at all levels;
- establishing measures to prevent, detect, and respond to unethical or non-conforming behaviour;
- giving support, information, and resources, in order to assist the personnel in the application of our Code;
- constantly improving our business management standards.

II. RESPECT AMONGST EMPLOYEES AND FOR THE WORKPLACE

1. Mutual respect at the workplace

At Veconinter, respect must be shown by all interested parties. Our daily activities require us to interact with individuals with diverse origins, such as: ethnic, cultural, religious, political conviction, age, gender, disabilities and sexual orientation.

Everyone is entitled to respect for our individual dignity, privacy and rights.

In accordance with our values, we respect the other and prohibit any behaviour and action that might give rise to discrimination, harassment, or violence.

Discrimination

Discrimination rises where an individual or group of individuals are treated in a different or negative manner because of their individual characteristics, beliefs, or any other reason, including their nationality or ethnic origin, culture, religion, political conviction, age, physical or mental incapacity, gender, and sexual orientation.

Discrimination is not tolerated within the Company.

Harassment

Harassment, whether sexual, psychological, or of any other kind, takes place when the treatment towards another person is shocking or offensive, affecting the dignity of the individual, their psychological and/or physical wellbeing, thereby generating a negative work environment. It may manifest through a conduct, comment, actions, repeated, hostile, or undesired gestures, or through a one-off and grave incident, that generates an intimidating, hostile, degrading, humiliating, or offensive work environment for a particular individual. This includes intimidation.

Harassment is not tolerated within the Company.

Violence

Violence is the use of physical force causing or that might cause physical injuries, as well as any action or actions, behaviour and/or comments that might be reasonably perceived as a threat to the safety or physical integrity of an individual.

Violence is not tolerated within the Company.

Physical aggression, threats, and other incidents related to violence occurring in our workplace must be reported to the corresponding authorities.

If an individual is the victim of discrimination, harassment, and/or violence at the workplace, or if a situation of that kind against another individual is witnessed, it must be immediately reported to the supervisor and to the Compliance Committee.

2. Health and security

The security of our personnel is of the utmost importance. Accordingly, Veconinter is committed to offer safe and healthy work surroundings in all of our offices.

Veconinter guarantees that all current laws concerning health and security at the workplace shall be observed in the areas in which the Company operates. We are committed to guaranteeing the protection of the health, safety, and physical wellbeing of our employees and of anyone that might come into contact with Veconinter through the identification of unsafe situations, the assessment of risks, and the elimination of hazards in the workplace.

In turn, this will allow us to create a work environment free from dangerous situations and/or injuries. We all must work together to reduce the frequency and seriousness of incidents and injuries, as well as to identify, report, and eliminate unsafe or dangerous conditions in the workplace. In the matter of work health and security, we all should feel responsible.

In order to obtain further information, please check the policies and/or the standard procedures on work health and security in the workplace with the Human Management Division.

3. Drugs and alcohol

Individuals whose work capacity is affected by the use of drugs or alcohol, impair their own work performance, the work environment, and the security of our employees, third parties, and the general public. The employees must not be seen under the influence of the use of drugs or alcohol whilst performing their work functions. Also, the consumption, sale, purchase, or possession of illicit drugs in the workplace are strictly prohibited.

4. Protection

Veconinter is committed to protecting its employees, assets, and information generally, wherever it performs its operations.

5. Personal and private information

Veconinter hereby commits itself to respecting the laws and regulations of different jurisdictions with respect to privacy, and to take such measures as may be necessary to guarantee the precision and safety of the data. Everyone should be careful and discrete in matters of personal information.

Veconinter will ensure that consent is obtained prior to disclosing personal information. All information disclosed or collected by Veconinter within the framework of its business activities will be used solely in the manner and for the purpose of:

- maintaining effective communication our commercial offers and services;
- providing our services

- performing the financial activities of billing, payment, and/or collection of the services;
- informing about new services that are related to the one(s) contracted;
- comply with legal requirements in accordance with obligations contracted with our clients, suppliers, employees, and other relevant interested parties;
- informing about the development, novelties, or changes that might take place in our services;
- assess the quality of the services provided;
- sharing, including the transmission of data to the informatics systems through which the services are controlled;
- offering commercial references.

Also, other situations might arise in which the law requires or permits the disclosure of personal information to third parties.

Such disclosure may be required in order for a third party to perform a software management, as part of an audit, or where local authorities where so required by the law.

III. AVOIDING CONFLICTS OF INTEREST

As personnel of Veconinter, we are all under the contractual obligation of loyalty to the Company.

There is an instance of conflict of interest if, during the performance of works in the Company, there arises an opposition between one's own interests and the interest of the Company, so that the judgement of the individual – concerning their primary interest – and the integrity of an action, tend to be unduly influenced by a secondary interest, generally of an economic or

individual nature, that might impair, compete or compromise the interests of the Company, its clients, and business partners.

Situations that represent conflicts of interests:

1. Secondary Employments and incompatible activities

Any external employment, activity, or service carried out by our personnel may not interfere with their work for Veconinter (these may not be alleged as excuses for low work performance, absence, constant delays, early exits, refusal to travel, refusal to work overtime or in different work schedules). Any actual or foreseen secondary labour relationship with another company or any managing position within another organisation must be reported. The Company limits its personnel to act as advisers, provide assistance to companies or entities that bear the nature of a client, contractor, subcontractor, or competitor, or that are in the same business line as it is, with or without remuneration for being a collaborator and/or owner.

The following situations represent conflicts of interests related to secondary employments and incompatible or conflictive activities:

- participating in secondary employment labour relationships that restrict our capacity to comply with our duties at Veconinter
- having a significant financial interest, either direct or indirect, in an outside company that maintains or intends to establish a commercial relationship with Veconinter or that is one of its competitors;
- participating directly or indirectly in an outside business or financial activity that actually or potentially competes with Veconinter;
- participating directly or indirectly in an outside business that offers services to or that has a commercial relationship with Veconinter. This is

especially relevant where there is the chance for receiving a preferential treatment thanks to our position in Veconinter;

- carrying out business activities on behalf of Veconinter with one of the members of our family or with a commercial organisation with which we or a member of our family is associated, unless the relation with such company has been previously disclosed to our immediate supervisor and to the Compliance Committee prior to reaching an agreement. In such cases, a specific no objection decision must be made.

2. Individual labour relationships in the workplace

Veconinter permits the employment of both individuals belonging to one same family and of individuals who carry on a relation individual with another individual working for Veconinter, provided there are no conflicts of interests.

The personnel are obliged to notify the Human Management Division those labour relationships that generate affinity links for reasons of marriage or domestic partnerships, establishing that on the date on which the relationship was generated, the Compliance Committee of Veconinter will evaluate the case, and it may make one of the following decisions:

- that our personnel continue to work in their respective areas and current positions;
- that they are relocated to different areas, applying the selection processes corresponding to their profiles;

The hiring of any relative or individual that has an affinity link with any of Veconinter's collaborators, regardless of the position to be held, will be subjected to the selection processes established by the Company and prior authorisation of the Board of Directors.

No direct labour relationship (supervisor – supervised party) is permitted between the following individuals: spouses, ascendants, descendants, uncles/aunts, nephews/nieces, cousins, brothers/sisters, stepsons/stepdaughters, mothers/fathers/brothers in law of the current or past marriages, except upon express authorisation of Veconinter's Compliance Committee.

It is mandatory that all our personnel disclose in writing to the Human Management Division whether their spouses, ascendants, descendants, uncles/aunts, nephews/nieces, cousins, brothers/sisters, stepsons/stepdaughters, mothers/fathers/brothers in law of the current or past marriages, and domestic partnerships work either in competitive companies or with our clients.

3. Relationships with former employees

The Company requires its personnel to make sure that, in the case of terminating the labour relationship with Veconinter, their relations with former employees are at all times in agreement with the rules of the Company.

Where the labour relationship is terminated, compliance with the following responsibilities is required:

- the provision of confidential information to any individual is not permitted, unless upon prior authorisation;
- a former employee may be re-hired upon completed the minimum period provided for by the law and pursuant to the policies of human management of the Company

In case of termination of the labour relationship, compliance with the following responsibilities will be required:

- return all the information of the Company in their possession;
- refrain from taking away confidential information of the Company or copies thereof;
- continue to safeguard the confidential information of the Company and refrain from disclosing or using it for the benefit of third parties, including any future personnel, without the previous and specific written authorisation of Veconinter

IV. ADOPTION OF ADEQUATE COMMERCIAL PRACTICES

Even though we are highly competitive in the markets in which we work, all our business activities must be carried out strictly in accordance with the current laws and regulations.

1. Anti-monopoly and fair competition rules

Our personnel shall refrain from being involved in any activity that might be reasonably perceived as incapable of competing, abusive, or unfair, as well as from attempting to obtain information about the competition through illegal practices (industrial espionage, bribery, theft, electronic espionage, etc.), and avoid making false or misleading statements about our competitors or their services.

2. Anti-bribery and anti-corruption rules

Veconinter undertakes to carry out its business activities with honesty and rigorously prohibits corruption and bribery in all forms.

We must not accept, solicit, offer, promise, grant, or authorise the delivery of a bribe, improper commission, payment, or any other element that might be interpreted as such (gifts, entertainment, employment, contracts, or benefits), either directly or indirectly, to any third party in order to influence their acts or

decisions, or to prevent such actions or decisions, with the intention of obtaining contracts or an improper advantage, or gaining an excessive influence over their actions.

We are all responsible of being informed as to how to recognise the activities of corruption and of guaranteeing that we are not involved in that kind of situations, whether directly or indirectly.

For more information, contact the Legal Consulting Department.

3. Payments for facilitation of services

Payments for facilitation of services are unofficial payments (as opposed to legitimate and official rates or payments) made to an individual for the purpose of guaranteeing or accelerating a government routine action or service to which the individual or the company that makes the payment is already entitled.

It is strictly forbidden to make payments for facilitating services.

4. Gifts – presents

Presents and adequate social courtesies may strengthen company relations. However, this kind of courtesies, received from or supplied by the personnel of Veconinter, must not exercise any undue influence over the company's decisions under any circumstance.

Following is a list of some of the criteria that must guide our acts:

- refrain from asking for or accepting gifts that might compromise criterion independence.
- Only reasonable attentions of an institutional nature may be accepted, such as books, agendas, pens, and any others of like nature, authorised by the Director or Manager of each area;
- presents in cash or an equivalent thereof, such as commissions, gift cards, certificates, coupons, vouchers, loans, shares, share options, air travel tickets, cruises, travels, etc., may not be either accepted nor offered;
- Veconinter's personnel may accept invitations to conferences, institutional visits to become acquainted with a business model, courses, and events of like nature, which must be endorsed by the area Director or Manager and/or the Compliance Committee;
- in no event may the value of such institutional gifts the amount equivalent to 100 dollars of the United States of America;
- refrain from accepting gifts or presents with the following characteristics:
 - luxurious or extravagant;
 - offensive, in bad taste, or that violate in any other manner the commitment to mutual respect;
 - that violate any law, regulation, or some rule or policy of the organisation of the individual who receives them;
 - that might be interpreted as a way to influence some active supply process or affect a pending commercial decision;
 - that might be interpreted as a bribe or an improper commission;
 - that are part of an agreement, whether formal or implied, to realise or receive something in exchange;
 - that might influence the individual receiving it or the company where such individual works in any commercial transaction;
 - that occur in a frequent manner.

We must be careful when offering any kind of courtesies, particularly to government officers, as these are subject to more strict rules, regulations, and laws.

Veconinter's personnel may not use individual funds on behalf of Veconinter to make gifts, offer food or entertainment to third parties, without being previously authorised by the corresponding Director or area Manager.

5. Third parties

A "third party" is any individual or organisation with which an employee may enter into contact during the performance of his/her duties and business activities. Generally, the third parties with which we interact in our business are: clients, competitors, suppliers, Government officials, and partners or business allies.

At Veconinter we strive to deal with all third parties in a transparent and exact manner.

We wish to work with other companies or individuals that share our values and high principles of honesty; accordingly, we expect such third parties to adopt and implement business practices that are consistent with our Code and:

- comply with all the applicable laws and regulations;
- refrain from incurring bribery, improper commissions, and other forms of corruption;
- refrain from getting involved in activities of money laundering and financing of terrorist activities;
- assume responsibility for the health and safety of their employees;
- respect their employees' human rights;

- try to promote sustainable local development;
- try to ensure that their business activities are performed in a manner responsible toward the environment;
- promote and reflect our commitment to the quality of our work.

The Company must suspend any relationship with a third party that acts in a manner not consistent with our values and practices.

5.1. Business partners

At Veconinter, we define a "business partner" as any third party that according to the context, acts on behalf of Veconinter or has become associated with it to perform a specific task.

Before the law, we are all responsible for the acts of our business partners as it is as if such acts have been carried out by us. Accordingly, we need to make sure that the individuals and organisations that act on behalf of the Company conduct themselves in accordance with our own ethical principles. Our obligation begins with the duty of carefully selecting our business partners and making sure they share the same values and business principles. During the commercial relationship, we must constantly and adequately supervise our business partners in order to avoid improper conducts.

5.2. Government officials

Given the type of activities performed by Veconinter, frequently we need to contact Government officials, either directly or indirectly. A "Government official" is an agent or employee, or any individual who represents or acts on behalf of: any level of the government (federal, provincial, state, municipal, etc.), political parties, representatives of political parties, and candidates to an

official entity, entities controlled or owned by the State, international or intergovernmental public organisms, or an individual who holds a legislative, administrative, judicial or military office.

Upon entering into contact with Government officials, we are responsible for being aware and strictly respecting the laws, regulations, or rules applicable to the interaction with such Government officials or contracting entities of the government.

In any event, we must:

- relate in an honest, precise, and transparent manner with Government officials;
- never offer something that might appear to be an individual benefit to a Government official, unless it is clearly permitted by the applicable laws and regulations, and it complies with our Code and its policies and standard procedures;
- refrain from offering anything of value to any third party if we have reasons to believe it will be delivered to a Government official;
- never get involved in potential employment opportunities with a current or former Government official, or with any of their direct relatives, without previously consulting with the Human Management Division.

Activities that might be acceptable when dealing with employees of companies of the private sector might be improper or even illegal when dealing with Government officials. Accordingly, we should all be particularly careful when interacting with Government officials.

6. Political contributions

Political contributions on behalf of Veconinter to candidates, political parties, organisations, or any other political entity at all levels of the government are strictly prohibited.

7. Money laundering and financing of terrorism

Our company will not be utilised for money laundering. Transactions in which an infraction cannot be avoided, will be rejected. The laws and regulations created for fighting against money laundering are fully respected.

For more information, check the Risk Administration Policy for the Prevention and Control of Money Laundering and Financing of Terrorism.

V. CORPORATE SOCIAL RESPONSIBILITY

1. Human Rights

All human beings must be treated with dignity, justice, and respect. Veconinter is committed to fighting for the protection and preservation of human rights in all its operations at global level, and to guarantee that the Company does not become an accomplice of any abuse against human rights.

2. Social commitment

Veconinter is committed to strengthening sustainable benefits for the local communities in which we live and work, to pay attention to the needs and expectations of the community, and to respect the unique character of each of the communities, by creating solid and sustainable relations. We co-operate with charity organisations, governments, and partners in the private sector to develop and implement sustainable programmes in connexion with our projects. We supply tools to local workers, companies, and communities through training, accompaniment, and the creation of abilities; we transfer

valuable experience and implement initiatives for improving the opportunities of employment and supply of our projects.

3. Donations and sponsorships

A donation means a contribution in cash or in kind, made by Veconinter to a charity organisation or not for profit, intended for benefiting society or a community.

A sponsorship is a commercial agreement whereby Veconinter makes a contribution to an organisation in exchange for rights negotiated by the Company for promoting its activities (for example, publicity, trade mark visibility, etc.).

Veconinter is committed to exercising its corporate responsibility through sponsorships and donations granted to a broad spectre of organisations carefully selected within areas in which we may make a significant difference.

At all times, we must take into account that such donations and sponsorships may pose risks of corruption and might be perceived as an attempt to obtain improper advantages.

4. Protection of the environment

Veconinter is committed to protecting the environment and to performing its activities in a responsible and sustainable manner.

VI. PROTECTION OF OUR ASSETS

We all have the responsibility, both individual and legal, to protect the assets of Veconinter and ensure that they are not damaged, stolen, worn out or used

in an improper manner. The "assets" include physical and intellectual property, time, information and data, both exclusive and individual, and corporate opportunities and resources.

It is forbidden to use the assets of Veconinter for unlawful, unethical, or improper purposes, or for the purpose of obtaining advantages or profit, either individual or for third parties.

1. Electronic Resources

Veconinter provides the necessary electronic resources to carry out its business activities. The "electronic resources" include, amongst others, electronic mail, information systems, and electronic equipment, software, Internet, and access to the web network. All electronic communications relating to the labour activity must be carried out through the corporate electronic mail address.

The use of non-corporate electronic mail addresses to send and receive communications related to the labour activity is strictly prohibited. Even though the personal use of the electronic resources of Veconinter is permitted, provided it is moderate and does not interfere with the labour obligations of the employee, the abusive use of this privilege is deemed to be an improper conduct. The electronic resources provided by Veconinter are the exclusive property of the Company and must be used in a responsible, appropriate, and ethical manner. We must never use the electronic resources of Veconinter for the exchange, storage, or processing of contents that:

- is prohibited by the law (such as the unlawful download of material protected by the intellectual property laws);
- promotes or incites harassment;
- might be perceived to be racist, defamatory, discriminating, violent, disastrous, sexist, or pornographic;

➤ might affect the reputation of Veconinter.

In any event, where electronic resources are used, we must take the necessary protection measures in order to avoid compromising the honesty of the Veconinter's equipment or systems, or disclosing private or confidential information.

Veconinter may exercise its supervision rights of supervision in connexion with the use of its electronic resources and reserves the right to control and review the contents being sent, stored, and processed in the electronic resources of the Company, as provided for by the law.

Check the policies established by the IT Division.

2. Confidential information

The confidential information belonging to Veconinter may include: details related to our company, clients, prices, markets, equipment, earnings, internal report figures, and other matters concerning our company; technical information concerning our services and processes; information related to our communication strategies, marketing, and services, details related to current or potential mergers, asset purchases or sales, and information related to employees and human resources. We must prevent the disclosure or the improper or unauthorised access to such confidential information belonging to Veconinter or to the third parties with which the Company relates. Our obligation to protect the confidentiality of the information is applied during the course of our functions and business activities with Veconinter and will remain in force even after the termination of our labour relationship with Veconinter.

3. Intellectual property

Copyrights, trade marks, designs, trade names, logotypes, inventions, improvements, photographs, videos, discoveries, and any other form of intellectual property (such as protocols, procedures, processes, proposals, etc.) created or modified during the course of our functions or business activities in Veconinter are the exclusive property of the Company.

Also, the intellectual property developed outside the relation with Veconinter belongs to the Company if such development arises from the use of confidential information acquired during the course of our functions and business activities in Veconinter. It is our duty to protect the intellectual property of Veconinter in the same manner that we must respect the intellectual property of third parties. Copying, misappropriating, or destroying any intellectual property of Veconinter's upon termination of the labour relationship with the company is illegal. Even though we may consider that during the performance of our functions in the Company we contributed to the creation of such work, that work is the exclusive property of Veconinter and we must not use it for other purposes or for the benefit of another employer. Likewise, Veconinter strictly prohibits the unauthorised use, theft, or misappropriation of any intellectual property belonging to third parties.

4. External communication

All opinions or information requested in connexion with Veconinter by external groups or organisations must be channelled through the Communications Department.

The Communications Management is the official contact for any member of the media who seeks to get an interview, an opinion, or any comment about the Company or any subject that might affect our business activity. Any request

received from the communication media, including if it is requested by way of a comment or personal opinion, must be transferred to the Communications Department. For more advice about external communications, contact the Communications Department.

VII. DENUNCIATION AND INVESTIGATION OF IRREGULARITIES AND COMPLAINTS

1. Obligation to denounce

All Veconinter personnel are obliged to report any suspected violation of the rules set forth in this Code of Business Conduct as well as any infringement of the applicable laws, rules, or regulations, or any situation of an improper conduct that compromises the ethical standards of the Company.

Open communication of situations and concerns by our personnel without fear of negative consequences is vital for the proper implementation of our Code. Accordingly, the Compliance Committee guarantees the confidentiality of the informer. It is not always easy to define and judge whether a situation violates the provisions of this Code of Business Conduct, for which reason it is expected that any doubt that the legal and/or ethical nature of a situation be reported to Veconinter's Compliance Committee.

The failure to report any matter might generate disciplinary measures, including the termination of the labour relationship.

2. Internal inquiries

The Compliance Committee will be exclusively in charge of making any necessary inquiries with sufficient support in case of reports of potentially illegal or unethical conducts. The inquiries will be carried out with absolute

respect, discretion, and privacy, and will be confidential to the extent permitted by the law and according to Veconinter's need to fully investigate the matter.

All Veconinter's personnel must co-operate with the internal inquiries carried out for non-compliance with this Code. The information submitted in connexion with the cases reported will receive a speedy, professional, and confidential response. If improper activities were detected, it is possible that Veconinter may be obliged to report them to the government or the corresponding authorities in charge of applying the law.

We all must co-operate fully, in a truthful and honest manner with the Compliance Committee and provide them with all the information they may request. The failure to co-operate may give rise to disciplinary measures.

VIII. ADMINISTRATION OF VECONINTER'S CODE OF BUSINESS CONDUCT

1. Implementation of the Code

All of Veconinter's personnel must sign a statement of commitment, knowledge, and compliance with this Code, as well as sign a statement of any conflict typified in this Code, which will be attached to their files.

2. Communication channels

The Company has established the following communication channels to solve any doubts about Veconinter's Code of Business Conduct, make suggestions, report exemplary cases that promote values, or to denounce improper conducts within the organisation by our personnel, guaranteeing full confidentiality.

In order to make any denunciation, contact the following address:

Electronic mail: denuncias@veconinter.com

3. Consequence system

The Company will start corrective actions in a rapid and proper manner in response to any infractions of this Code.

Any personnel or director whose conduct is forbidden by the Code as established by the Company, may be subject to disciplinary measures that might include from reprimands to the termination of their job with the Company, without prejudice to any action, obligation, or sanction that may result from the current law.

4. Policies against retaliation

Veconinter prohibits retaliation against any personnel that have reported in good faith an infraction, whether actual or assumed, of this Veconinter's Code of Business Conduct, the policies, or the rules of the Company and the laws.

5. Administrative structure of Veconinter's Code of Business Conduct

The administration of Veconinter's Code of Business Conduct corresponds to the following individuals or entities:

- the Human Management Division;
- the Legal Consulting Management;
- the Audit Management.
- Veconinter's Compliance Committee.

It is the responsibility of Veconinter's Compliance Committee to ensure the due diffusion and application of this Code of Business Conduct, which means:

- promoting the values and conducts encouraged in Veconinter's Code of Ethics and Business Conduct;
- serving as a channel for consulting;

- Veconinter's Compliance Committee shall report to the Board of Directors, bi-annually, every case submitted and the actions enforced by this entity;
- approving corrective measures that guarantee global consistency;
- attend to any clarification requests of our personnel;
- updating and amending Veconinter's Code of Business Conduct;
- promoting the reading, review, and understanding of Veconinter's Code of Ethics and Business Conduct;
- follow up all the complaints reported and issue an opinion on the validity of the reports filed;
- direct the corresponding inquiries to the relevant units in order for these to take steps and document the cases;
- promote consistency at global lever with respect to the interpretation and application of the Code.

The members of Veconinter's Compliance Committee or Unit are appointed by the Veconinter's Board of Directors.

The guidelines contained in this Code of Business Conduct are not intended to be exhaustive and are supplemented by the policies of the Company and the laws issued by the State.

6. Disciplinary measures

The disciplinary measures that generate as a consequence of the inquiries submitted by the responsible parties for the violations to this Code, will be recommended by the Compliance Committee.

This document has been approved by the members of the Board of Directors of Veconinter.