

SPPLIERS CODE OF CONDUCT

| Signed at, Date: | |
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Statement and mutual commitment

Genneia S.A. (all together with its controlled companies, "Genneia" or the "Company") is committed to doing business with honesty, integrity, and transparency (see Code of Conduct section 1.2). The Company is committed to legal compliance and ethical business practices in all of its operations. In furtherance of these standards, the Company expects all of its third-party vendors and suppliers (the "Suppliers") to comply with all applicable laws and regulations in the places in which they do business, to take strong measures to ensure that their third-party agents, vendors and suppliers do so as well, and maintain the highest degree of ethics in every aspect of their business with Genneia and others.

Suppliers are expected to: identify and size the scope of their operations and those they carry out on behalf of Genneia, as well as potential risks that may affect the communities, the environment and their surrounds; promote ethical values of respect, cooperation, teamwork and the behavior guidelines included in this Code of Conduct; maintain accessible, open and constructive communication channels to the community and its employees (or adopt those provided by Genneia); train its employees, agents and subcontractors on topics that Genneia considers appropriate, according to the level and magnitude of the products and / or services provided; make its employees aware of this Code of Conduct concepts and practices, including complaints mechanisms for non-compliance.

Regulations Compliance

Genneia expects from each supplier, its agents and subcontractors, strict compliance with the Code of Conduct and all Company Compliance Policies, including:

- Anti-Bribery and Corruption Policy, and all applicable laws regarding political contributions and payments;
- <u>Sanctions Policy</u>, and all applicable laws regarding imports, exports and manufacturing, including those
 related to importation or exportation of technology, and responsible sourcing, such as the U.S. DoddFrank conflicts minerals regulations, and regulations concerning the import or export of goods containing
 prohibited animal wildlife, plant product or by product;
- Insider Trading Policy;
- Data Protection Policy, and all applicable laws regarding privacy, data and information security; and
- Supplier Compliance Policy and Compliance Reporting Policy.

Genneia further expects from each supplier, its agents and subcontractors, strict compliance with all applicable laws, including those regarding:

 Anti-money laundering, and maintaining accurate financial reporting systems and records relating to each Supplier's dealings with the Company;



- Government contracting, public tenders, the execution of administrative contracts or in any other interaction with the public sector, including Law No. 27,401 of Corporate Criminal Liability, Decree No. 277/2018, and Decrees No. 1023/2001 and 1030/2016 on Public Procurement;
- Fair trade, including free competition, anti-trust laws, and intellectual property rights;
- Comprehensive labor and pension regulatory framework and the provisions of the Argentine Labor Risk Law;
- Prohibitions against discrimination, harassment and retaliation;
- Workers' rights to join workers organizations or trade unions, or to collective bargaining, respecting their conventional framework.
- Retrenchment planning in accordance with Argentinian regulations and international best practice.
- Fair and ethical employment practices, immigration, wages, days of service, rest periods, hours, overtime, benefits, leaves, and occupational health and safety;
- Prohibition against the use of child labor and forced labor, and,
- The environment and environmental safety.

Suppliers must ensure and maintain confidentiality, integrity and availability of Genneia's information, it associated assets and the processing facilities of such information. In particular, it undertakes to:

- Use this information only for the purposes agreed in the contractual agreement and comply with the terms of Law No. 25,326 on the Protection of Personal Data. In the case of subcontracting, only the information must be shared with the consent of Genneia, and the responsibilities regarding confidentiality, integrity and availability are extended to the subcontracted parties.
- Maintain secrecy and confidentiality with respect to all the information to which it has access due to the products or services provided to Genneia or regarding information that arises directly from its commercial relationship, and even during the term of two (2) years counted after completing the contractual relationship.
- Act as diligently as possible regarding information treatment, conservation, storage and transportation. To do so, it must adopt the means that ensure and guarantee its custody and secrecy, unauthorized access by third parties and loss prevention.
- Not falsify, modify or unauthorized disclose Genneia's information. Under no circumstance, supplier personnel will communicate on behalf of GENNEIA nor may they make public statements and must respect the company's social media use procedure.
- Return all Genneia assets in its possession upon termination of the agreement or contract, including confidential information.
- Consider risks associated with information security, when facing changes in services or products provided to Genneia.
- Assign management responsibilities and establish procedures to ensure a rapid, effective and orderly response to information security incidents.
- Report any incident or security weakness observed or suspected in its own or Genneia systems or services, involved in the commercial relationship with Genneia.



Compromiso con la Calidad, el Medio Ambiente, la dimensión Social, la Seguridad y Salud Ocupacional

Genneia manages its activities through processes, conscious and committed to quality, the environment, the social dimension, safety and occupational health, ensuring compliance with the legislation and regulations in force by all the collaborators working on behalf of the organization.

The knowledge and acceptance of our Integrated Management System (SIG) Policy, available on our website, commits suppliers to:

- Document and keep traceable and reliable records of the activities carried out.
- Participate in required corporate activities and trainings.
- Promote a continuous improvement culture, which includes reports of findings with active participation in analyzes and treatments.
- Promote respect and care in the relationship with its employees, its suppliers and contractors; and with the communities in the areas where it operates, inserting itself in the communities in which it acts in a sustainable and respectful manner.
- Develop their activities in a manner that prevents, minimizes, mitigates and/or compensates for negative environmental impacts, in accordance with the legislation in force at the site where they are acting, and achieves a high level of safety in their facilities, products and services, paying special attention to the protection of its employees, contractors, customers and local environment. In particular, when these are developed in Genneia facilities, the supplier must know and enforce its employees and subcontractors, all the Health, Safety, Hygiene and Environmental standards of our Company that are applicable to them.

Genneia ensures respect for Human Rights and those principles governed by the International Labor Organization, as well as for safety and labor welfare of all its employees.

Likewise, The Recruitment Management Policy, is a corporate policy observed by Genneia in the recruitment and selection process, that shall be complied with by Genneia's vendors and affiliates. The Recruitment Management Policy purpose is to:

- Be guided by the premise of equal opportunities to equal capabilities, avoiding any type of discrimination.
- Engage in recruitment and selection processes that are in compliance with the parameters established by the applicable labor regulatory framework, mitigate contingencies, and promote respect for all applicants.
- Keep confidential all information and documentation provided by and/or related to the applicants.
- Support the promotion and integration of people with disabilities to the labor market.
- Encourage communication and optimize interpersonal relationships in a framework of clear rules and common expectations.

Suppliers must wear an identification card in a visible manner when delivered or request in Genneia sites. No illegal drugs or unauthorized weapons by the contracted service will be admitted to the facilities, nor the entry of drunk personnel or under the effects of illegal narcotics.

Suppliers may not accept, request or receive any gift, gratuity or advantage from third parties, directly or indirectly, in connection with the provision of their services or products to Genneia.



Compliance Reporting and Adherence to the Code

Genneia will not tolerate violations of law or Company policy, and we will investigate all issues, including those that are brought to our attention. We depend on you to report promptly any suspected violations or compliance concerns. We encourage you to be proactive by asking questions, seeking guidance, and reporting suspected misconduct and/or violations of the Code of Conduct or other Company Policy (see <u>Code of Conduct section 1.2</u>).

By contracting with Genneia, each supplier is representing and certifying to Genneia that it is in compliance with the Code set forth above. Should any supplier discover that it is not in compliance with this Code, it must promptly provide written disclosure to the Company.

Genneia also reserves the right to survey or audit its supplier's compliance with its Code of Conduct and Company Policies with respect to their business with the Company. Accordingly, Genneia includes such right in the terms and conditions of each supplier contract. Such surveys or audits may be conducted by Genneia or through an independent third party, in days and business hours to be coordinated with the supplier, to monitor compliance and contract performance.

If it is found that a supplier has committed a violation of this Policy, the Company may take appropriate actions, including sanctions and even suspension of the contractual relationship or termination for breach. Such measures shall be subject to an appropriate investigation and will depend on the violation.

For any questions regarding Genneia's Supplier Compliance Policy, please contact Genneia's Chief Compliance Officer.

If you become aware of any violation of this Policy, <u>you can make an anonymous report through the Compliance Reporting Form on Genneia's website at:</u> <u>www.Genneia.com.ar</u> under <u>Contact Us</u> or by emailing <u>conducta.empresarial@genneia.com.ar</u>. If you identify yourself, though, the Company can follow up with you to ensure that your concern is resolved and to provide feedback.

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