

## Policy on Supplier Compliance

This Supplier Compliance Policy supplements the Code of Conduct and applies to all directors, syndics, employees, contractors, and third parties acting on behalf of Genneia or its controlled companies (all together, “**Genneia**” or the “**Company**”). Genneia requires its directors, syndics, employees, and third-parties acting on its behalf to follow this Policy to the fullest extent allowed by law.

Genneia 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.

Accordingly, 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;
- Sanctions Policy, 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. Dodd-Frank 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
- 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.
- 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.

The Company is committed to the following standards while dealing with Suppliers:

- Genneia performs a pre-selection of Suppliers depending on bids submitted by the suppliers for projects (involving construction or acquisition of new sites – “Large Projects Transactions”). The pre-selection process considers factors such as prior performance in similar projects, pre-existing business relationship, industry reputation and referrals, financial assessment and others required in Genneia’s Supplier Process.
- Genneia requires its Suppliers to notify the Company of any subcontractors it engages to conduct work in Large Projects Transactions. The bids submitted by the suppliers must include the list of the possible subcontractors and Genneia can suggest the replacement for others. No subcontractor approved by Genneia in the contract terms should be replaced by other not included in a pre-approved shortlist without Genneia’s consent.
- Genneia performs annual financial assessment of Suppliers and require their declared credentials (certifications). Additionally, it performs monthly or ad hoc evaluations to make sure all Suppliers are performing in accordance to their contractual obligations, and does not issue any payment before such evaluation has been fully and appropriately performed.

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 Code of Conduct section 1.2).

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

Genneia also reserves the right to survey or audit its suppliers 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 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 termination of the contractual relationship 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 a Genneia’s Chief Compliance Officer. If you become aware of any violation of this Policy, you can make an anonymous report through the Compliance Reporting Form on Genneia’s website at: [www.Genneia.com.ar](http://www.Genneia.com.ar) under *Contact Us* or by emailing [conducta.empresarial@genneia.com.ar](mailto:conducta.empresarial@genneia.com.ar). If you identify yourself, though, the Company can follow up with you to ensure that your concern is resolved and to provide feedback.

<b>Approved by:</b> <b>Walter Lanosa</b>	<b>Effective Date:</b> <b>December 2020</b>	<b>Version: 01</b>
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