

## Policy on Anti-bribery and Corruption

This Anti-bribery and Corruption (“**ABC**”) Policy supplements Genneia’s 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 is committed to complying with all applicable anticorruption laws where it does business, including the U.S. Foreign Corrupt Practices Act (“**FCPA**”), the Organization for Economic Cooperation and Development (“**OECD**”) Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, the Argentine Criminal Code, the Argentine Corporate Criminal Liability Law No. 27,401 (collectively, the “**ABC Laws**”), and with all applicable public sector and administrative contracting laws, including regulations Decree No. 277/2018, Decrees No. 1023/2001 and No. 1030/2016 on Public Procurement and the guidelines and recommendations on prevention of unlawful conduct in administrative contracts issued by the Anti-Corruption Office of the Ministry of Justice and Human Rights of Argentina in accordance with Decree No. 277/2018 (collectively, the “**Public Contracting Laws**”).

Genneia is further committed to complying with all applicable financial recordkeeping and reporting requirements, including those of the U.S. Currency and Foreign Transactions Reporting Act of 1970, as amended, and Argentinian applicable anti-money-laundering and counter-terrorism financing laws, including Laws No. 25,246, 26,087, 26,119, 26,268 and 26,683 of Argentina (collectively, the “**AML Laws**”) where it does business.

**Policy Statement on Anti-bribery, Corruption and Anti-Money Laundering.** Genneia does not tolerate bribery or other forms of corruption, or improper or corrupt conduct related to administrative or public contracts. Genneia complies with all applicable ABC Laws, Public Contracting Laws, and AML Laws governing the countries where it conducts business.

The following conduct is against Genneia policy and the Public Contracting Laws: (i) influencing the procurement process by illegal means; (ii) circumventing or breaking the rules for importation of products; (iii) gaining access to and using non-public bid tender information; (iv) evading taxes or penalties; (v) influencing the adjudication of lawsuits or enforcement actions (vi) obtaining exceptions to regulations by means prohibited by existing law; (vii) avoiding contract termination by unlawful means.

Those working for Genneia or acting on its behalf may not offer, promise, or give a bribe—which can be *anything* of value, even if not money—to anyone, nor may they request, agree to accept, or accept a bribe from anyone. Genneia conducts business with only reputable suppliers and customers who are involved in legitimate business activities and whose funds are derived from legitimate sources.

All suspicions of bribery, corruption, or violations of the ABC Laws, the Public Contracting laws, or the AML laws will be investigated and any violations of Company Policy or applicable laws may result in disciplinary action, contract termination, or legal action. The Company may also report suspicions of corrupt or illegal activity to the applicable authorities, who may prosecute suspected offenders, who could face civil or criminal fines, penalties and imprisonment as a result.

Genneia's employees have an obligation to understand the content of this Policy, to watch for suspicious activities in conducting their business, and to report potential compliance concerns to their supervisors or according to Genneia's Compliance Reporting Policy.

This Q&A section answers common questions about the ABC Policy.

**What is bribery?** Bribery is the act of giving something of value to another person so that the recipient will act illegally or dishonestly for the giver's benefit. The payment does not have to be money or financial in nature. It can be anything of value, including favorable treatment, a discount, a job offer or promotion, or tangible goods, including gifts, entertainment, sports tickets, or clothing. For example, if a person gives money to a policeman so that the policeman will stop investigating the person's business, that is bribery. Less obvious forms of bribery, such as hiring relatives of government officials or offering lavish gifts are illegal acts of bribery.

The person who accepts the bribe breaks the law even if he or she never planned to do what was promised in exchange for the bribe. It is the act of offering, giving, asking for, or receiving payment that is unlawful.

Someone giving or seeking a bribe does not have to do it directly, but rather can hire an agent. For example, if a government official hires someone else to request a bribe from a businessman, both the official and the person asking for the bribe have acted unlawfully, and the businessman will have acted unlawfully if he or she offers, promises or pays the bribe.

**What are some other forms of corruption?** Beyond bribery, other common forms of corruption include kickbacks, extortion, graft, embezzlement, and fraud. Genneia does not tolerate any form of corruption.

*Kickbacks* are a type of bribe. With a kickback, the bribe-taker does something for the bribe-giver, and in return gets a commission from the bribe-giver. One example is a government official who accepts a company's bid on a project, and in return gets 25% of the company's profits on the project.

*Extortion* is when one person threatens another into giving him or her something. An example is "protection money," where a group forces a business owner to pay so that the group will not destroy the business.

*Graft* is a general term for when someone in power wrongly uses their power for personal gain. For example, a government official commits graft if he or she has inside knowledge about a dam-building project, then uses that knowledge to buy land where the dam will be built so that he or she can sell it to the government for profit.

*Embezzlement* is when someone is trusted with another's property, but then takes that property for himself or herself. For example, an accountant trusted with a company's money commits graft if he or she takes some of the company's money and puts it into his/her personal bank account.

*Fraud*, broadly, is the act of deceiving others for personal gain. If, for example, a customer pays a businessman for 20 boxes of electronics, but the businessman decides to send the customer 20 empty boxes, then the businessman has committed fraud.

***Can I accept a gift from a business partner or third party?*** Under certain circumstances, you may accept traditional or customary gifts, or gifts of nominal value as permitted by applicable local laws. You may not accept cash or cash equivalents such as stipends or gift cards or gift certificates. Any gifts or hospitality that you accept cannot be tied to any valid business purpose or be intended to unduly influence a commercial decision. You must obtain approval from your supervisor and the Chief Compliance Officer to accept gifts or hospitality valued at or over US\$100. We rely on you to exercise good judgment in accepting gifts or hospitality.

If you have any questions or concerns, you should ask your supervisor and the Chief Compliance Officer. You can find more information about exchanging benefits and gifts in [section 7 of the Code of Conduct](#).

***Can I offer gifts or hospitality to third parties?*** Under certain circumstances, you may offer traditional or customary gifts, or gifts of nominal value as permitted by applicable local laws. You may not offer cash or cash equivalents such as stipends or gift cards. Any gifts or hospitality that you offer cannot be tied to any valid business purpose or be intended to unduly influence a commercial decision. You must obtain approval from your supervisor and the Chief Compliance Officer to offer gifts or hospitality valued at over US\$100 or the equivalent. We rely on you to exercise good judgment in offering gifts or hospitality. If you have any questions or concerns, you should ask your supervisor and the Chief Compliance Officer. You can find more information about exchanging benefits, gifts, hospitality, and entertainment in [section 7 of the Code of Conduct](#). Also review the relations with third parties, including suppliers and public officials, in [sections 5 and 6 of the Code of Conduct](#)

***What if I am not sure if something constitutes a bribe or is corrupt?*** You should ask the Legal Department, or Chief Compliance Officer if you have any questions or concerns about bribery or corruption.

***What is Genneia doing to prevent bribery and corruption?*** Genneia is committed to following applicable ABC laws. To ensure compliance, the Company implements periodically compliance training for all directors and employees.

***What is Money Laundering?*** Money laundering is the process by which a person conceals the nature of a crime and makes it appear as legitimate activity. Anti-Money Laundering laws around the world make it a crime to engage knowingly in a transaction that involves the proceeds of criminal activity.

***What is Terrorist Financing?*** Terrorist Financing is the means by which a person provides or collects funds to support terrorist acts. Counter-terrorism financing laws make it a crime to use legally or illegally obtained funds to further terrorist activities.

***What conduct should I consider suspicious of possible money-laundering or terrorist financing activity?***

- A customer or supplier provides insufficient, false or suspicious information or is reluctant to provide complete information;
- Methods or volumes of payment that are not consistent with the payment policy or that are not customarily used in the course of business.

- Requests by a customer, supplier, or third party to pay in cash;
- Orders or purchases that are inconsistent with the customer’s trade or business;
- Payments to or from third parties that have no apparent or logical connection with the customer or transaction;
- Payment to or from the government (or an agent, agency or instrumentality of the government), or a government-controlled entity, of countries or territories currently covered by the most comprehensive territorial U.S. economic sanctions, including Cuba, Iran, North Korea, Sudan, and Syria (a “**Target Country**”).
- Payments to or from countries considered to be tax havens or offshore jurisdictions;
- Payments from countries unrelated to the transaction or not logical for the customer;
- A customer’s or supplier’s business formation documents are from a Target Country, or a country that is not logical for the customer;
- Any customer or supplier for whom it cannot be determine the true beneficial owner;
- Structuring transactions to avoid government reporting or recordkeeping requirements; and
- Unusually complex business structures, payment patterns that reflect no real business purpose.

**How should I report suspected corruption?** If you suspect that a coworker or third party acting on behalf of Genneia is acting corruptly or trying to act corruptly, or has violated or is violating the ABC Laws, the Public Contracting Laws, the AML Laws, or Genneia Policy, you must report it according to the Company’s Compliance Reporting Policy. Every person in Genneia is responsible for helping to ensure that the Company complies with applicable ABC, AML and public procurement laws, rules and regulations.

If you think that a coworker or third party acting on behalf of Genneia has violated, is violating, or will violate applicable ABC or AML laws or this Policy, or has acted unethically regarding public tenders, in the execution of administrative contracts or in any other interaction with the public sector, you should immediately notify the Chief Compliance Officer or Legal Department, pursuant to the Company’s Compliance Reporting Policy. No one will face any adverse consequence for raising concerns in good faith. You can also email [conducta.empresarial@genneia.com.ar](mailto:conducta.empresarial@genneia.com.ar) to report a concern *or make anonymous reports online through the Company’s Compliance Reporting Form, which can be accessed on Genneia’s website at: [www.Genneia.com.ar](http://www.Genneia.com.ar) under Contact Us*. 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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