

Policy on Compliance Reporting

This Compliance Reporting 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.

The Company expects that all third parties with which it conducts business will do so with honesty, integrity, and transparency and will not violate any applicable laws. The Company encourages all third-party agents, suppliers, and customers to comply with this Compliance Reporting Policy.

Genneia is committed to doing business with honesty, integrity, and transparency (see Code of Conduct section 1.2). The Company 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).

Policy Statement on Compliance Reporting. Genneia encourages promptly reporting any suspected or known violation of law or Company policy. Anyone may report a suspected violation or compliance concern, including employees, third-party agents, suppliers, and customers. The Company takes all reported claims seriously and will timely, and confidentially, investigate each claim. Employees who in good faith report suspected violations will receive the support of the Company from retaliation and discrimination, given their status as good faith complainants.

In general, Genneia employees can always directly report a suspected or known violation to their supervisor, Human Capital, Internal Audit, or the Chief Compliance Officer if necessary. The person’s identity and information provided will be shared only as needed to resolve the concern. Employees may also anonymously report suspected violations through Genneia’s online Compliance Reporting Form: conducta.empresarial@genneia.com.ar or *make an anonymous report through the Compliance Reporting Form on Genneia’s website at: 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.

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

What principles does the Compliance Reporting Policy rest on? The Company’s Compliance Reporting Policy is grounded in nonretaliation, confidentiality, and a culture of compliance. Employees and others should feel supported by the Company raising concerns of suspected violations without fear of retaliation. Anyone who in good faith reports a suspected violation will receive the support of the Company given his/her status as good faith complainants and will in no way be retaliated or discriminated against for making the report. Retaliating against an employee for making a report in good faith is a serious violation of this Compliance Reporting Policy. An employee who retaliates against another employee for reporting a concern will be subject to disciplinary actions and sanctions.

What behavior should be reported? Employees can report any suspected violation of law or Genneia policy. This includes, without limitation, violations of Genneia’s anti bribery policies, violations of safety laws, accounting rules, securities laws, and the Company’s Code of Conduct. All reports must be made in good faith, honestly and sincerely. Abusing the Compliance Reporting Policy—for example, to pursue a personal grudge with a coworker—will amount to misconduct. An abusing employee may

be held accountable for damages suffered by anyone affected by a false report and face disciplinary actions and sanctions.

How should I report suspected violations? Any person can report a suspected violation to Genneia. You can make an anonymous report through the Compliance Reporting Form on Genneia’s website at: www.Genneia.com.ar under Contact Us or by emailing conducta.empresarial@genneia.com.ar.

If you are an employee, all suspected violations can be reported to your supervisor or Human Capital. Sometimes, though, you may feel insecure reporting a suspected violation to them. If so, you can make a report with Internal Audit, or the Chief Compliance Officer or email a written report to: conducta.empresarial@genneia.com.ar.

While the Company encourages everyone to make reports openly, you may also make a report anonymously. Anonymity, however, might make the investigation harder, leading to a delay in action or less action than if the report had been made openly. Further, the Company cannot follow up with you to ensure that your concern is resolved or provide feedback if the claim is anonymous.

Does the Company keep records of suspected violations? Yes. The Chief Compliance Officer keeps a log of all reports for a minimum term of 5 years, along with records of investigations into reports and the final decision. These records are kept according to Genneia’s Data Protection Policy.

Approved by: Walter Lanosa	Effective Date: December, 2020	Version: 01
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