CAMALEÓN THIRD PARTY CODE OF CONDUCT



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At Camaleón we seek to work with people who reflect the values and principles that good faith commands in business, we require third parties that are not only limited to compliance with the rules, but also raise their actions to ethical standards of transparency, justice, and loyalty. That is why we propose this code of conduct for third parties who are linked to our company. To that end, Camaleón requires certain third parties working with Camaleón or on behalf of Camaleón worldwide to comply with this Thirid- Party Code of Conduct (Code).

Recipients: This Code applies to certain third parties that work with or on behalf of Camaleón. The Code is a principles-based document, setting forth Camaleón´s expectations for the vendors, suppliers, freelancers, contractors, intermediaries and other third parties with whom we do business. Your employees, independent and subcontractors, consultants, or anyone that you work with or contract with as part of your relationship with Camaleón should understand and comply with all provisions of this Code.

Recipient's responsibilities: Third parties must treat customers, business partners, employees, and others with respect and courtesy. Third parties should have a process in place to ensure complaints, questions, and allegations can be reported in a safe, confidential, and anonymous (where allowed by law) manner. Retaliation is not tolerated in relation to reporting good-faith violations of this Code, also:

- 1. Comply with all applicable laws, rules, regulations, policies, and contracts governing your relationship with Camaleon.
- 2. Operate honestly, fairly and with integrity in all your business activities and relationships.
- 3. Maintain accurate books and records, as well as detailed, accurate and transparent documentation regarding all expenses.
- 4. Compete fairly and responsibly in the marketplace.
- 5. Require your suppliers, subcontractors, and other third-party intermediaries to comply with this Code. Never use subcontractors or other third-party intermediaries to violate these standards or any legal requirements.
- 6. Create and sustain a culture where ethical business practices are adhered to by all.

Fair Employment: Follow applicable labor and employment laws and regulations, including laws that pertain to freedom of association, privacy, immigration, wages and hours, employment discrimination and forced, compulsory and child labor. Extend equal treatment to all individuals without regard to race, color, ethnicity, religion, sex (including pregnancy, childbirth, and medical conditions related to pregnancy, childbirth, or breastfeeding), gender, gender identity, gender expression, sex stereotyping (including assumptions about a person's appearance or behavior, gender roles, gender expression, or gender identity), ethnic or national origin, age, mental or physical disability, ancestry, medical condition, marital status, military or veteran status, citizenship status, sexual orientation, genetic information, or any other protected status of an individual or that individual's associates or relatives under applicable law.

Anti-Discrimination: Third parties may not discriminate against any worker based on race, color, age, gender, sexual orientation, ethnicity, disability, pregnancy, religion, political affiliation, union membership, national origin, or marital status in hiring and employment practices such as applications for employment, promotions, rewards, access to training, job assignments, wages, benefits, discipline, termination, and retirement. In addition, third parties may not require workers or potential workers to undergo medical tests that could be used in a discriminatory way, except where required by applicable law or regulation or prudent for workplace safety.

Anti-Harassment and Abuse: Third parties must be committed to a workplace free of harassment. Third parties may not threaten or subject workers to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental coercion, physical coercion, or verbal abuse.

Prevention of Underage Labor: Third parties shall only employ workers who have the legal age, according to their respective applicable legislation and in any case, provided they do not perform work that might jeopardize their health, safety, or morals

Working Hours: Third parties must follow all applicable laws and regulations with respect to working hours and days of rest, and any overtime must be voluntary.

Occupational Health and Safety Management: Third parties must establish a process to identify and document foreseeable occupational health and safety hazards in the work environment and make all efforts to manage the risks associated with those hazards. Foreseeable hazards are categorized as physical, chemical, biological, ergonomic, and mechanical, and examples may include noise, illumination, indoor air quality, and emergency preparedness.

Corruption: Third parties may not engage in corruption, extortion, embezzlement, or bribery. A bribe is defined as offering or receiving anything of value to any person for the

purpose of obtaining or retaining business or securing an improper advantage. Never give, offer, or authorize the offer, directly or indirectly, of anything of value (such as money, gifts, hospitality, meals, travel, discounts, jobs or internships for relatives, charitable contributions, political donations, goods or services) to a supplier, customer, government official or commercial third party in order to obtain an improper business advantage. To build on the above, be sure to comply with:

- 1. Never accept a gift of cash, regardless of the amount.
- 2. Never offer any gift or hospitality to a government official, supplier, customer or other third party without prior consent from Camaleon.
- 3. All gifts and hospitality, in connection with Camaleon projects or work, regardless of the amount, must: (i) be consistent with Camaleon's business interests; (ii) be modest and reasonable by local and industry standards, including in terms of value and frequency; (iii) be consistent with customary business practices; (iv) be given or accepted without an expectation of receiving something in return; (v) be consistent with laws and regulations applicable to both the giver and the recipient; and (vii) be approved by Camaleon.
- 4. Maintain accurate and complete records of any gifts, hospitality, gratuities and similar expenditures and ensure such records reflect the true nature of the transaction.

Interactions with Public Officials: A public official is any person who is paid with government funds or serves in a public function. Camaleón expects any third party working with a public official to adhere to additional rules and obligations, including meal, gift, and travel limits.

Gifts: Please check with your Camaleón contact before providing any gift. Third parties should not offer any gifts, regardless of value, to Camaleón employees or anyone working on behalf of Camaleón that are meant to influence a decision or are otherwise in violation of Camaleón's gifting policies

Conflicts of Interest: Third parties must conduct business openly and transparently. Third parties should avoid and disclose to Camaleón any conflicts of interests like significant relationships. Significant personal relationships include, but are not limited to, spouses, dating or physical relationships, and close friends.

Avoid any activities or relationships that could conflict or appear to conflict with Camaleón's interests or your responsibilities while working with Camaleón. Do not use Camaleon information, resources, influence, intellectual property or facilities for personal benefit or to promote a competing business or activity.

Money Laundering: Third parties may not engage or assist others in concealing illicit funds or other suspicious activities. The following are examples of potential money laundering that merit further investigation:

- Attempts to make large payments in cash.
- Payments by someone who is not a party to the contract.
- Requests to pay more than provided for in the contract.
- Payments made in currencies other than those specified in the contract.
- Payments from an unusual, non-business account.

Tax Evasion: Tax liabilities must be paid. Third parties may not assist or otherwise facilitate the nonpayment of true tax liabilities of its third parties, or related entities.

Accuracy of Records and Reports: Third parties must ensure that all records and reports provided to Camaleón or to any government or regulatory body are comprehensive, accurate, timely, and compliant with applicable legal and financial standards. Third parties must never misstate facts, omit critical information, or modify records or reports in any way to mislead or assist others in doing so.

Privacy: Camaleón is committed to ensuring the privacy of the end-user customers of Camaleón services. Third parties are required to comply with all privacy laws and regulations. Third parties must take appropriate precautions — including administrative, technical, and physical measures — to safeguard customers' personal information against loss, theft, and misuse, as well as unauthorized access, disclosure, alteration, and destruction.

Confidentiality of Camaleón's Information: Camaleón is committed to ensuring the privacy of the end-user customers of Camaleón services. Third parties are required to comply with all privacy laws and regulations. Third parties must take appropriate precautions — including administrative, technical, and physical measures — to safeguard customers' personal information against loss, theft, and misuse, as well as unauthorized access, disclosure, alteration, and destruction

Protection of Intellectual Property: Third parties must respect the intellectual property rights of Camaleón and other third parties and may not knowingly use the intellectual property of any third party without permission or legal right.