Code of Ethics and Business Conduct
Integration Group
Partners’ Statement

Throughout its existence, Integration Group¹ has earned a solid reputation for inspiring trust in its professionals, clients and suppliers for conducting business with integrity and in accordance with the laws and regulations that govern its activities in the countries in which it operates.

This Code of Ethics and Business Conduct was specifically designed to serve as a reference for all interested parties (stakeholders), such as employees, partners, associates, managers and directors of the Integration Group ("professionals"), clients, suppliers, authorities, representatves of associations and foundations and the community in general, on the principles by which Integration conducts all its professionals relations in all countries where it operates.

In addition, Integration has established criteria that are essential parameters that convey what it is and what it does. The purpose of this criteria is to help our professionals understand Integration’s expectations in some specific topics, as well as to demonstrate the essence behind each of its decision.

These criteria are defined through internal policies ("Essencis") which were documented to ensure as much as possible, the 7 Ethical Principles² in the operationalization of Integration’s decisions anywhere in the world, mitigating the potential conflicts of interest to the maximum. These documents that constitute Essencis are complementary to this Code of Conduct and are available for internal circulation on Integration’s intranet with exclusive access to its professionals.

It is up to each professional we work with, and most importantly, Integration’s leadership, to guarantee compliance with the Code of Ethics and Essencis by actively sharing it with their colleagues and teams, as well as encouraging the communication of conducts and behaviors that are not in accordance with the rules described herein and disseminating the whole ethical culture that Integration cultivates.

It should be noted that this Code does not intended to exhaust all possible situations of ethical questioning that may occur within the scope of Integration and the relationships that it maintains with the various stakeholders. This Code of Conduct should serve as a reference for decision-making in certain situations that professionals may face. For this reason, Integration seeks to update and revise this Code of Conduct periodically in order to ensure that it is increasingly complete and robust, and is the responsibility of each professional, in case of need, find the most updated version made available by Integration in its most varied access channels.

Professionals should seek guidance in case of doubt about which attitude to take in a given situation, because “taking the right attitude” is the responsibility of everyone and, at the same time, of each one.

At this point, Integration is now available to listen to any suggestions, comments or questions you may have regarding the content of this Code of Ethics and the expected conduct from each of the professionals. Therefore, we want to leave an open channel to hear to your contribution to further improve Integration’s ethical professional environment.

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¹ Integration Group is composed of the following companies, but not limited to them: Intenta Participações Ltda., Integration Empreendimentos e Participações Ltda., Integration Consultoria Empresarial Argentina S.A.U., Integration Consultoria Empresarial Ltda., Integration Implementação de Soluções em Gestão Empresarial Ltda., Integration Consultoria Empresarial - Chile Limitada, Integration Management Consulting GmbH, Integration Consultoria de Mexico, S. de R.L. de C.V., Integration Management Consulting Ltd. and Integration Management Consulting Inc. (“Integration”).

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1. To Whom this Code of Conduct applies

This Code of Conduct applies to all Integration stakeholders, that is, all those who work with or for, or represent Integration in any way.

Integration expects all its stakeholders to act ethically and fully in the conduct of their business, being in accordance with the precepts of this Code of Conduct, in order to act as an example for other people and companies that can experience the ethical culture in everyday life, as well as help in its dissemination in the business environment.
2. Business Principles

Integration encourages all stakeholders and other publics within its circle of influence to adopt the principles of integrity and business ethics, internal controls, corporate governance and attention to human rights.

To conduct business, Integration follows the 7 Ethical Principles of Respect, Cooperation, Dignity, Simplicity, Justice, Honesty and

2.1. Legality

In each country where Integration operates, it will follow local laws and regulations. In situations where the law does not address a certain issue, Integration will apply its own criteria based on its culture and ethical principles. In the event of a conflict between a country’s law and Integration’s criteria, the country’s law shall prevail.

2.2. Political Neutrality

Integration opts for neutrality with regard political parties and ideologies. In this way, Integration’s name and resources cannot be used to promote the interests of political parties or candidates, even for political donations or contributions.

However, despite its position as a company, Integration respects the individual right of each person to engage in political matters and will not interfere with such activities, which should be developed solely and exclusively outside Integration’s working environment and without requiring any advantage for Integration in return. Nor will any kind of party-political debate be allowed within Integration’s offices and especially in the premises of its clients.

2.3. Business Ethics

Integration is committed to a high ethical standard in conducting business. In this sense, the company does not admit the practice of corruption by professionals and observes this same principle in relationship with all stakeholders.

Integration and its professionals must not offer, promise, grant, lend or in any way give, directly or indirectly, including through third parties, to clients, potential clients, partners, government parties, public employees, suppliers or any representatives of these entities any rewards or benefits (financial or otherwise) by violating laws or regulations with the purpose of influencing an action in an improper manner or to gain some advantage or favor themselves or for others or simply to conduct business with such a person or entity.

Likewise, Integration professionals should not accept, receive or demand, in any way, either directly or indirectly, including through third parties, to clients, potential clients, partners, government parties, public employees, suppliers or any representatives of these entities, such rewards or improper advantages.

In addition, professionals should avoid any activity or behavior that, in any way, might give an appearance or create suspicion of carrying out or attempting to perform inappropriate conduct under the law and this Code of Conduct.

Any form of fraud or corruption, including blackmail, bribery, money laundering and other illegal practices will not be tolerated in business transactions, whether in the public or private sector.

Professionals should be aware that offering or delivering improper benefits to influence the decision of a third party, even if such third party is not a member of the government or a public authority, may...
result not only in disciplinary sanctions under Integration, but also in the adoption of criminal proceedings arising from such conduct.

2.3.1. Donations and Sponsorships

Integration has made the decision to contribute to society and the environment through partnership with local institutions in the countries where it acts to promote a positive socio-environmental impact, supporting causes that it considers relevant according to international principles of socio-environmental.

In this sense, Integration understands that there are three forms of contribution accepted by the organization: (a) through volunteering; (b) through pro bono projects; or (c) through donations. Any partnerships or donations may only be made upon prior approval by Integration, within the scope of its corporate governance, with the consequent deliberation of the responsible partners.

In addition, Integration sponsors events and institutions within its business scope as a way to promote its brand and expand its scope of action, such as making financial donations to third sector institutions, conducting mentoring sessions to assist students in building career plans, helping students prepare for recruitment and selection processes and achieve better employment opportunities, participating in and sponsoring events for entrepreneurs, offering coaching sessions for entrepreneurs and potential entrepreneurs through meetings, among several other actions. Any sponsorship must be previously approved by the local leadership and, if necessary, involve the Marketing Area, considering the strategic agenda of the company in decision making.

2.3.2. Receipt and Delivery of Gifts

Integration professionals should not request or accept from their business partners any type of personal benefit (financial or otherwise), such as: gifts, payments, private services, conveniences, loans, favors, trips not related to business etc., since such offers can affect - or imply affect - their objectivity and critical analysis in business decisions.

However, we understand that on certain specific occasions (such as year-end parties, commemorative dates etc.) it is common to offer gifts and other professional courtesies. In this way, it is established that Integration professionals will only be able to accept or offer meals of reasonable value and consistent with local customs, besides being able to accept and offer symbolic gifts, without commercial value, such as pens, calendars, pen drives, cards, agendas etc., in any case, provided they are appropriate in the circumstances. However, Integration professionals should not accept or offer gifts, meals or entertainment whenever such behavior creates or implies an appearance of improperly influencing their business relationship.

Specifically, regarding the services provided by Integration, after the end of a consulting project, it is common to have the assignment and receipt of small goods and gifts related to the services provided. In such situations, the offer is permitted provided that the limits of reasonableness and local customs set forth above are respected, as well as any client policies, if applicable, and the Experience Manual created by the Marketing Area and available on the Integration’s Intranet. The following examples of gifts can be both accepted or offered: personalized boxes with pen drives, tribute plaques, trophies, folders and books with the project content, informative materials, table displays, folders, calendars, notebooks, among others.

2.3.3. Events Participation

In case Integration professionals are invited to participate in or attend events of their business partners, the costs should preferably be covered by Integration, according to its internal policies.

Any exception to this rule must be approved by the leader of the area in which the professional belongs, which in case of doubt, must necessarily consult the Risk & Compliance Committee.

The receipt of gifts and/or presents during such events must follow the terms of item 2.3.2 above.
2.3.4. Conflicts of Interest

Conflicts of interest occur when an Integration professional’s personal interests or of a third party compete against with Integration’s interests. Integration understands that professionals should make decisions and behave in an appropriate manner, without being influenced by private issues that can, consciously or unconsciously, affect their judgment or lead to a promotion of favors.

If a situation of a conflict of interest occurs, whether formal or material, a priori or a posteriori, or if a professional faces a situation that may potentially involve or lead to a conflict of interest, such professional must immediately communicate to their direct superior and/or to the Risk & Compliance Committee so that the situation may be resolved in a fair and transparent manner for all parties involved.

As an example, the following items represent hypotheses of conflicts of interest:

2.3.4.1. External Business Activities of Professionals

Integration respects the individuality of all professionals and understands that they can perform external professional activities in addition to their role at Integration.

Therefore, the following guidelines should be followed by professionals who wish to perform parallel activities:

- No activity outside of Integration should be carried out by its professionals if such activity interferes in their responsibilities, performance, deadlines or dedication before Integration, its clients, suppliers or business partners, or if it generates risks to the Integration’s reputation, or if it represents or may represent any form of conflict with Integration’s interests.

- Professionals may not use Integration’s working hours and/or resources to perform such activities, nor may they use the professional relationship, contacts or networking that have been generated in client, supplier or partner companies and organizations to carry out any type of approach outside of Integration’s relationship – this is because it is the obligation of each professional not only to guarantee the confidentiality of the information of Integration and its clients, but also to maintain a position of impartiality and professionalism. When Integration provides consulting services, several contacts are generated in the relationship with the client and this allows the professionals to have access to several confidential information of these companies and, therefore, no professional should rely on their presence or Integration’s presence in a client, supplier or partner to offer third party services, whether they are Integration’s competitors or not.

- It is prohibited to sell products or services within the premises of Integration’s offices or of its clients.

For cases in which the professional has some kind of relationship, whether remunerated or not, with another company or organization, such as an employee, counselor, director, shareholder etc., while acting as an Integration professional, Integration understands that the professional can recommend Integration’s services to that other company or organization, however, some precaution need to be taken in order to avoid situations of conflict of interest: (i) it is recommended that the professional should inform the other company or organization of the relationship with Integration; (ii) it is recommended that the company or organization consider other consulting firms for the intended services, allowing exemption from the decision; and (iii) the professional should not be the person who approves or does not approve the hiring of Integration within the company or organization.

Although there is no conflict of interest with Integration, it is the professional’s prerogative to decide, whether or not to disclose their extra activities. However, it is the professional’s duty to inform Integration about such activity in case of conflict, by means of a communication to the Risk & Compliance Committee.

2.3.4.2. Competition between Professionals and the Company
Professionals should not engage in activities competing with those of Integration, directly or indirectly, nor should they seek to obtain personal advantages or promises of business opportunities for themselves or for others that they become aware during their relationship with Integration and during their work with Integration’s clients.

2.3.4.3. Competition with Clients

Integration understands that it can provide services to directly competing companies, since it has structured policies and processes that aim to guarantee the protection of its clients’ confidentiality, thus, avoiding conflicts of interest when providing services to competing companies, by establishing clear criteria about the separation of consulting teams who should attend one and the other competitor and, in some cases, on the impossibility of attending a certain company, always applying the same criteria in each situation so that it can make an adequate decision considering each case specifically.

Furthermore, it is important to emphasize that Integration will never compete with the activities developed by its clients, in order to protect its growth and reputation as a reliable and respectable consulting company that values its clients.

2.3.4.4. Employment of Family Members

Integration permits the hiring of relatives (regardless of the degree of kinship) and spouses or partners of its professionals, as long as there is no direct or indirect subordination relationship between the professional and their family member or partner and the professional does not participate in the recruitment and selection process of their family member or partner. Such hiring should be based solely on the candidate’s personal qualifications, performance, skills and experience, following the same recruitment and selection process applied to all.

In case the relationship between Integration professionals (of a family or matrimonial nature) is initiated after the hiring of such professionals and there is a direct or indirect subordination relationship between them, such relationship shall be conducted in the most professional way possible and shall avoid, whenever possible, conflicts of interest, favoritism or any impartiality in the daily dealings. Any episodes resulting from this type of situation will be handled by the Professional Development Cell.

2.3.4.5. Shareholding Interest in Clients

Given the nature of the services provided, Integration professionals are often in contact with confidential and sensitive materials from their clients, having access to critical and restricted information from these companies. Moreover, the professionals who perform the consulting projects assist clients in making decisions and defining action plans that can directly or indirectly impact the company’s financial results, as well as affect its performance in the financial and stock market. For these reasons, the acquisition or sale of shares, quotas or any securities of the clients or companies in which clients have a relevant participation may imply a conflict of interest that may even be interpreted as a legal violation or regulatory instruction of a regulatory body, given that the professional will be using a privileged position to obtain an improper advantage in the stock market.

Integration maintains a strict posture regarding this matter. Thus, professionals must inform the Risk & Compliance Committee if they possess shares, quotas or any securities of clients when they start their professional activities or if they are allocated in a project in a company of which the professional holds a reasonable amount of stocks at that moment.

In addition, the purchase or sale of shares, quotas or any type of stocks by professionals related to Integration’s clients is strictly prohibited. For the purposes of this topic, clients are those clients that have or have had consulting projects with Integration that have closed in the last 24 months and counting retroactively from the date of purchase of shares, quotas or any other type of shareholding participation. This rule is valid regardless of the country in which the services were provided, of the professional’s position in Integration, whether or not
the professional has participated in the referred project. Any exception to the rules hereby established must be evaluated jointly by the Risk & Compliance Committee and the Legal Department.

2.3.5. Relationship with Competitors and Respect for Competition Laws (Antitrust Laws)

Relationships with competitors should be carried out in an ethical, respectful and professional manner. Integration believes in free competition and is prepared to compete successfully in today's business environment, always complying with applicable laws regarding the defense of free competition and fair trade.

Integration and its professionals do not propose or accept to enter into any type of agreement with competitors that may harm their customers, suppliers and the economy in general way, through unfair business practices or that may deprive the benefits of free competition.

All professionals who are in regular contact with competitor companies have the responsibility to ensure that they know the competition laws and confidentiality duties applicable in their countries. In case of doubts, the Risk & Compliance Committee should be contacted.

2.3.6. Relationship with Government

All institutional actions related to authorities, politicians and public employees, such as offering gifts and courtesies, travel, invitation to participate in events of Integration or its clients, requests for hearings even when related to projects at clients etc., must be conducted and approved by the Executive Committee, observing the respective laws in effect for such purpose.

According to internal policies, Integration only participates in bids/competitions to provide consulting services to public agencies and companies, in any sphere of power, from direct or indirect Administration, that are situated in countries perceived as low level of corruption by the international community, using the Corruption Perception Index published by Transparency International⁴. Additionally, and regardless of the country, any invitation to submit a service proposal to public agencies and companies must be submitted to the Management Committee before any response by Integration.

2.3.7. Contracting Third Parties

Third parties hired by Integration must be committed to read and understand the terms of this Code of Conduct, since Integration may, directly or indirectly, be impacted and even held responsible for actions or omissions of the third parties it hires, suffering financial and reputational losses.

For this reason, any contract must be formalized, as the case may be, by means of a budget or specific contract, which must contain detailed scope, amounts, term, obligations of the parties and anti-corruption clauses and compliance with this Code of Conduct.

2.4. Fraud and Protection of Company Assets

Professionals should neither directly nor indirectly engage in any type of fraudulent or dishonest conduct that involves Integration’s assets, financial and accounting reports/statements. Such type of conduct can lead the professional to disciplinary sanctions and might result in criminal charges.

Integration’s reports and financial statements serve as the basis of the management of the business and the fulfillment of its obligations to the authorities. Therefore, any financial or accounting information must be accurate, updated, complete and aligned with the general accounting principles and the standard rules applicable to each country.

In order to ensure integrated control in accounting matters, Integration centralizes the accounting of all countries in which it operates in a single global supplier, so that it meets validated international standards in all operations, while at the same time complying with local accounting rules.

2.4.1. Intellectual Property

Professionals should be especially careful and with the appropriate and correct use of Integration’s tangible and intangible assets,

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⁴ Corruption Index is at https://www.transparency.org/en/cpi and Integration only works with the public sector of countries with scores above 75/100. For reference purposes, in the year 2019 the scores of the countries in which Integration works are the following: Germany - 80/100 | Argentina - 45/100 | Brazil - 35/100 | Chile - 67/100 | United States - 69/100 | Mexico - 29/100 | UK - 77/100.
including the “Integration” brand. All professionals must protect the company’s assets from loss, damage, misuse, theft, fraud, improper access or destruction.

Special attention should be given to the Intellectual Property owned by Integration and its business partners. Intellectual property covers, but is not limited to patents, trademarks, reproduction rights, business secrets, domain names, logos, methodologies, market data and client lists, as well as any information classified as confidential know-how.

Integration maintains policies and procedures to ensure the confidentiality of the information it receives from its business partners, especially regarding intellectual property. In this way, it expects that those who manipulate its intellectual property have the same level of care, attention and discretion to protect its assets.

Any use of logos, videos, images and voices of third parties, including professionals, where applicable, must be preceded by authorization from the person in question, in the terms established by Integration’s internal policies. Likewise, an equal level of diligence is expected when Integration’s intellectual property is handled. Any request for authorization for use must be sent to the Legal Department, which will make the validations internally with the Marketing Department and the Risk & Compliance Committee.

2.4.2. Internet, E-mail and Social Media

Internet, e-mails and electronic equipment necessary for the work are made available by Integration solely for work purposes. The use of electronic systems, internet, e-mail or any other means granted by Integration to transmit, receive or download content of a private or non-work nature related that harms professional activities or that is illegal is not allowed.

Computers, servers and any other devices or tools made available by Integration, including e-mails sent and received by corporate e-mail, are the property of Integration and will not be considered private content, except as determined by local legislation. This way, Integration is entitled to monitor, audit and investigate threats or vulnerabilities to its cyber security, regardless of prior notice. Therefore, all its professionals must use the company’s resources and assets in accordance with internal information security policies.

Social media, at work or in any other environment, should not be used to expose private or confidential information of Integration or its stakeholders.

2.5. Human and Labor Rights

Integration supports and respects the Universal Declaration of Human Rights of the United Nations and does not condone any cases that may violate these rights. Likewise, Integration seeks to apply such precepts in its work environment.

2.5.1. Work Environment

Integration promotes the culture of a safe, healthy work environment, focused on professional development, providing equal opportunities for everyone and respecting each person as this person is and acknowledging their individuality, recognizing that each professional is unique. Because of this, Integration’s “Purpose” is to guarantee environment, rituals and tools that allow individual development as a professional. This purpose is expressed in our day by day, with practical actions within the company that allow all professionals to experience it positively.

One of the most important tools to ensure the maintenance of the work environment and the culture of Integration is the “Ombudsman/Audience”. It is a confidential channel opened exclusively to its professionals who want to clarify doubts, register complaints and/or suggestions, since Integration seeks the contribution from the point of view of each of its professionals. It is about a direct communication channel between the professional and the organization. This channel is managed by the Professional Development Cell, an internal structure of Integration’s governance, which is responsible for receiving any and all messages from Integration’s professionals via e-mail, and should be directed to the person, department or entity in charge to provide forwarding and answer in the most appropriate way, according to the subject addressed.

For the external public, the Contact Us available on the Integration website (https://integrationconsulting.com/en/contact-us/) may
be used for the same purposes. Should any of Integration’s stakeholders wish to file a report on misconduct, the organization provides the IntegrityLine, which is best detailed in item 4.1 Violation Report, below.

2.5.2. Nondiscrimination and Diversity

Integration hires, remunerates and treats professionals in an equal and non-discriminatory way with respect to any issues of gender, religion, age, special needs, sexual orientation, nationality, political opinion, ethnic or social origin. Diversity in the workplace is respected, valued and encouraged at all levels. No discrimination of any kind is accepted by its professionals.

This way, any decision related to Integration’s professionals should be taken considering only their professional qualifications, such as professional experience, educational background, knowledge, performance, business skills, management abilities etc.

2.5.3. Prohibition of Child Labor or Slavery or Analogue to Slavery

No form of forced or child labor is tolerated by Integration and the minimum age for hiring professionals must follow that provided for by local legislation, except where local legislation provides for a lower age than that provided by the International Labor Organization Convention (ILOC) that regulate the minimum age for work and economic activity.

2.5.4. Moral and Sexual Harassment Prevention

Integration guarantees, in the work environment, personal dignity, privacy and personal rights of all professionals and is committed to maintaining a work environment free from any type of harassment, repudiating any conduct in that sense, whether moral or sexual. If any misconduct is identified, IntegrityLine is available to capture and investigate such situations, so that it can maintain and ensure the well-being in the work environment for all professionals.

2.5.5. Freedom of Association

Integration respects the rights of its professionals to unite and conduct collective negotiations through organizations and trade unions, in accordance with the applicable legislation. Workers’ representatives will be protected against any type of discrimination or retaliation.

2.5.6. Safety and Health

Integration is very concerned with the physical work environment and the well-being of professionals, ensuring constant maintenance, care, hygiene, cleanliness and ergonomics in the offices, in accordance with all the laws and standards related to work safety and hygiene.

Moreover, all Integration professionals must, in the exercise of their duties and wherever applicable, respect all safety and protection standards when they are on the clients’ premises.

It should be noted that Integration believes that a healthy environment should be the result of everyone’s effort and, therefore, the company should provide all professionals with a safe and comfortable environment so they can speak openly about occupational health issues, such as depression, burnout and anxiety, ensuring confidentiality, and thus seeking the well-being of all professionals.

2.6. Sustainability and Environmental Respect/Care

Integration meets all environmental laws and standards applicable to its activities. Besides, it seeks to value and promote conscious and sustainable attitudes towards the environment, because it understands that even small actions can make a difference, such as not printing a document if it is not strictly necessary.

Integration is concerned with sustainability and has a competence center to dedicate itself exclusively to this subject, promoting, inside and outside the company, the awareness and implementation of sustainable practices in the work environment. By understanding that the conservation of the planet’s resources and the well-being of future generations are everyone’s responsibility, Integration seeks to deliver value to its clients through projects and products focused on sustainability.
3. Confidentiality and Personal Data Protection

No professional is authorized to disclose externally, during the term or after the end of their contract, sensitive information about Integration and/or its business partners (“Confidential Information”) which they have access during the term of its relationship with Integration, without proper authorization from Integration. “Confidential Information” shall mean all information related to business and operations disclosed or otherwise made available to the professional, including, but not limited to: economic data, sales, legal, contractual, methodologies (registered or not), know-how, client and supplier information, financial and accounting statements, employee and director data, management data, strategic planning, adopted policies, technical information, as well as all copies, and other derived documents containing such Confidential Information.

In addition, it will be handled with due confidentiality by Integration and its professionals and considered “Confidential Information” all and any personal data received in the scope of business, which shall be collected and processed in strict compliance with applicable personal data protection laws, the data subject being granted all rights provided by law, such as, but not limited to the rights of access, rectification, deletion etc.

As a consequence, Integration expects its business partners who have access to Integration’s Confidential Information, including their professionals’ personal data, to collect and treat such data following the same protection and confidentiality precepts.
3.1. Use of Confidential Information

Confidential Information obtained by Integration must be used by it and its professionals exclusively for the execution of the business in question. Professionals will not use or allow third parties to use such confidential information for any purpose other than the one for which it was disclosed.

3.2. Information Security

Confidentiality is very important, because Integration works with different clients, from different segments and in different countries at the same time. Clients trust Integration with their information, and therefore, all professionals are responsible for ensuring maximum transparency and integrity while respecting the credibility deposited in Integration. It is the responsibility of each one of the professionals to watch over and preserve the right to confidentiality and integrity of such information, reflecting Integration’s image and reputation in the market.

Additionally, Integration works with several partners and suppliers in all operations and in different countries, which also reveal information of their property and which is of great relevance, and as such, they must be treated with the highest levels of security and integrity by those who possess them.

To earn this trust, companies expect Integration to protect their information, from defining a robust information security policy (which Integration has designed and implemented following the best market practices), to taking simple actions on a day-to-day basis, such as: using Integration’s pen drives with encryption enabled, eliminating documents after use; ensuring the confidentiality of printed materials; not sharing the password with third parties; always blocking the computer in case of temporary absence etc.

Integration’s Technology Area also employs security solutions that use the latest in data privacy incident prevention. Among these solutions are autonomous systems that use artificial intelligence and machine learning resources to identify external and internal threats, in order to ensure the security of all data. The concepts of “Zero-Trust” and “admin-proof” are also adopted, which determine that the system administrators themselves are audited by independent companies and several security layers are adopted in order to ensure system redundancy in case of operation failure or incorrect use.

3.3. Confidential Information Disclosure to Third Parties

Any requests for access to information classified as confidential, and which is in possession of or owned by Integration, to third parties not bound to the initial purpose for which it has been consented by its holders, must be previously approved by the Legal Department or by the Professional Development Cell (when dealing with personal data of professionals or former professionals) of Integration. The availability of such information will be conditioned to the owner’s approval under the data protection legislation in effect in the country where such demand occurs, except when there is a legal basis for such treatment.

Confidential information should not be considered as such if it: (i) was already known to the receiving party prior to any disclosure by the disclosing party; (ii) was publicly available prior to any disclosure by the disclosing party, or subsequently become public information without the receiving party having contributed to such disclosure; (iii) has been received by the receiving party from a third party legally in possession of such information, and not as a consequence of a violation of any agreement or any confidentiality relationship with the disclosing party; (iv) has been independently developed by the receiving party, without any relation to the confidential information of the disclosing party; or (v) is disclosed by the receiving party in accordance with an order issued by a competent authority in judicial or administrative proceedings.
4. Compliance with this Code of Conduct

It is the responsibility of each professional to guarantee full and complete compliance with all the terms of this Code of Conduct, and to seek guidance, when necessary, from direct superior, the Legal Department or the Professional Development Cell through Audience. Making the right decision and ensuring the high standard of integrity promoted by Integration is the responsibility of each professional.

4.1. Violation Report

All clients, suppliers and Integration’s business partners have the right and the duty to report any potential violation of the precepts established in this Code of Conduct immediately to Integration.

Therefore, Integration created IntegrityLine, which is an exclusive channel to report eventual misconduct of the company’s professionals, with the guarantee of confidentiality and anonymity, at the sole discretion of the person who reports. In addition, it is guaranteed to anyone who reports any occurrence or suspicion of an act of misconduct to this Code of Conduct precepts for appropriate protection and shield, since Integration prohibits any kind of retaliation.

Given the nature and importance of this channel, IntegrityLine should be used responsibly by everyone, including those who make reports. In this way, false or malicious reports will not be tolerated. This type of conduct will also be investigated and restrained properly.

These reports can be filed through the following channels:

- **Website**: integrityline.integrationconsulting.com, available in Portuguese, English, and Spanish.
- **E-mail**: integrityline@ethicschannel.com, available in Portuguese, English, and Spanish.
- **Telephone**: Monday thru Friday from 10:00 to 20:00 (Brazil time, Brasília), or through the answering machine, which is available 24 (twenty-four) hours a day, in Portuguese, English, Spanish, and German in the following numbers:
  - **Argentina**: 0800-345-5481
  - **Brazil**: 0800-450-2220
  - **Chile**: 800-914-517
  - **Germany**: 0800-182-1916
  - **Mexico**: 800-099-0757
  - **United Kingdom**: 0800-069-8049
  - **United States**: 1(800)242-0651

All registered information will be handled in a strictly confidential manner, by Integration and by the third-party company that manages this channel.
4.2. Disciplinary Measures

After taking all possible measures to investigate the incident, including carrying out any necessary investigations, Integration reserves the right, in case of identification of a conduct that violates this Code of Conduct and/or its internal policies and/or the legislation in effect, to apply disciplinary measures to those who were held responsible for such conduct, whether by action or omission. Such measures include, but are not limited to legal action, termination of employment ties (with or without just cause), termination of the contractual business ties (even if corporate), warning (verbal or written), suspension etc. It is important to emphasize that the adopted measure must consider the local legislation and the principles of reasonableness and proportionality according to the gravity of the deviation of conduct.

Integration does not tolerate any kind of retaliation, veiled/hidden or not, against any person who makes, through the channels provided by Integration, a report in good faith.