



Code of Conduct

Introduction

Since its founding, Conexsol® has operated on a foundation of integrity, honesty, fairness, and full compliance with all applicable laws. Conexsol® employees around the globe adhere to these principles in their daily responsibilities, and today, our reputation remains one of the company's most valuable assets. The Conexsol® Corporate Business Principles outline the values and principles that guide our operations worldwide. This Code of Conduct expands on these principles by establishing non-negotiable minimum standards for behavior across key areas.

Employees are expected to adhere to the following fundamental principles:

- Avoid any conduct that could harm or endanger Conexsol® or its reputation.
- Act legally and honestly.
- Prioritize the company's interests over personal or other external interests.

For the purposes of this Code, references to "employees" include employees, associates, officers, and directors of Conexsol® and its subsidiaries.

Article 1: Compliance with Laws

Conexsol® and its employees are governed by law at all times. Compliance with all applicable laws and regulations is non-negotiable. Employees must also adhere to internal policies and regulations that may exceed legal requirements.

Article 2: Conflicts of Interest

Employees must always act in Conexsol®'s best interests. A conflict of interest arises when an employee's personal interests or those of a third party compete with Conexsol®'s interests. Employees should avoid conflicts of interest whenever possible.

Article 3: External Direction and Activities

We are proud of Conexsol®'s reputation and prioritize the company's best interests in all external work and activities. Employees should not engage in outside activities that interfere with their responsibilities or could harm Conexsol®'s reputation. Any doubt should be clarified with Human Resources, Legal, or Compliance.

Only with prior authorization from a member of Conexsol®'s Executive Board may employees hold the following roles externally:

- Director
- Officer

- Employee
- Partner
- Consultant

Article 4: Family and Relatives

Our hiring and personnel development decisions are fair and objective. Direct relatives or spouses may be employed only based on qualifications, performance, and competencies, without any direct or indirect reporting relationships. Children of Conexsol® employees may receive preference for internships or temporary roles if equally qualified.

Article 5: Corporate Opportunities

Employees who wish to pursue business opportunities potentially of interest to Conexsol® must notify their Line Manager, who will seek a managerial decision. If the company decides not to pursue the opportunity, the employee may pursue it personally only if it does not compete with Conexsol®'s operations.

Article 6: Insider Information

We comply with Insider Trading regulations regarding the purchase or sale of Conexsol® securities. Trading based on non-public information is strictly prohibited and may result in disciplinary action or criminal charges. Employees should seek guidance from Legal or Compliance if unsure.

Article 7: Competition and Fair Trade

We believe in free competition. Conexsol® competes in the global market and always complies with competition, antitrust, and fair-trade laws. Pricing and commercial policies must be set independently and never agreed upon with competitors. Employees, especially those in sales, purchasing, and marketing, must be familiar with these laws.

Article 8: Confidential Information

We value and protect our confidential information and respect that of third parties. Confidential information includes trade secrets, business plans, customer insights, and any non-public data. Employees must prevent unintentional disclosures and maintain confidentiality even after employment ends.

Article 9: Fraud and Asset Protection

Employees must act with honesty and respect company assets. Any fraudulent activity involving company assets or records is prohibited and may result in disciplinary action or criminal charges. Financial records must be accurate and comply with Conexsol® accounting principles.

Article 10: Bribery and Corruption

We reject all forms of bribery and corruption. Employees must not offer, promise, or accept any improper personal or financial favor to gain a business advantage. Violations may result in disciplinary actions and criminal prosecution.

Article 11: Gifts, Meals, and Entertainment

Business decisions are based solely on quality and competence. Employees may only accept or offer meals or symbolic gifts appropriate to the circumstances, avoiding any appearance of undue influence.

Article 12: Discrimination

We promote diversity and respect personal dignity. Conexsol® is committed to a workplace free of discrimination and harassment. Employees must not discriminate based on origin, nationality, religion, race, gender, age, or sexual orientation.

Article 13: Compliance

All employees are responsible for full compliance with this Code and should seek guidance from their Line Manager, Human Resources, or Compliance when needed. “Doing the right thing” is a personal responsibility.

Article 14: Reporting Misconduct

Employees must report any actions or practices they believe are inappropriate or illegal under this Code to their Line Manager, Human Resources, or Compliance. Reports may be confidential, and Conexsol prohibits retaliation against employees who report in good faith.

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