



INTELIGO SAB

# Code of Ethics

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COMPLIANCE

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# Code of Ethics

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### Version 1

**Approval date:** 19/12/2019

**Change autor:** Legal Management

**Change summary:** First version

**Revised by:** Human Resources Development Management

**Approved by:** Board of Directors

### Version 2

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**Change autor:** IPH's CCO

**Change summary:** Align with international good practices, integrate the requirement for compliance with the internal policies and guidelines of Inteligo SAB, as well as provisions related to the [Human Rights Policy](#)

**Revised by:** Human Resources Development Management

**Approved by:** Board of Directors

### Version 3

**Approval date::** 31/05/2024

**Change autor:** IPH's CCO

**Change summary:** Updating the following sections: Presentation, Willful blindness, Liabilities and penalties, Our commitment, Ethical policies Incorporation of the Commitment to the Code of Ethics.

**Revised by:** IFS's CCO

**Approved by:** Board of Directors

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### Commitment - Code of Ethics

## Presentación

At Inteligo SAB our vision is to “Ensure that our clients are the best advised in Latin America.”

We are convinced that the best way to achieve our vision is to make the right decisions and always act with integrity. For this reason, we seek to ensure that our directors, employees and stakeholders act ethically and with integrity at all times, regardless of their position, geographic location or level of responsibility.

The Code of Ethics reflects our principles and values, as well as the way in which we achieve our vision and strengthen our reputation.

Thank you for joining us in our commitment to do things right. We are confident that we will achieve our vision together!

**Daniel Yagui**  
**General Manager**



## 1. Objective and Scope

This Code of Ethics represents our beliefs, values and principles, and establishes the guidelines and standards of conduct that should guide the decision-making and actions of the directors, employees, suppliers, contractors and business partners of Inteligo SAB in their relationship with customers, shareholders, directors, employees, counterparties and other stakeholders.

## 2. Willful Blindness

Acting with integrity is a fundamental part of our conduct and decisions; therefore, we must play a leading role in identifying and reporting misconducts. In this sense, if we are aware of any unethical conducts and deliberately ignore it, we incur in "willful blindness", a situation that makes us accomplices or participants of the identified misconducts.

## 3. Reporting and Whistleblower Protection Channels

All of Inteligo SAB's directors, employees, suppliers, customers and other stakeholders have the right and duty to report behaviors that violate the guidelines of this Code of Ethics or any other improper act, and may do so anonymously through the Inteligo SAB Whistleblowing Hotline:

Web: <http://canaleticointeligo.lineaseticas.com>

We have a zero-retaliation policy and the necessary mechanisms in place to ensure the integrity and confidentiality of reports.

## 4. Liability and Penalties

Inteligo SAB's directors, employees, suppliers, and business partners represent us at all times and in all places. They are therefore obliged to comply with the guidelines set forth in this document 24 hours a day, 7 days a week.

Failure to comply with the guidelines of this Code of Ethics will result in penalties that may range from the application of disciplinary measures as established in the Internal Labor Regulations, which may range from a warning to a dismissal or the termination of an agreement, as the case may be.

## 5. Ethical Principles of Inteligo SAB

At Inteligo SAB, we have ethical principles to manage our business. These are:

- Be HONEST, always acting with integrity.
- FULFILL the rules and commitments we undertake with others.
- Be TRANSPARENT with the information we handle.

- RESPECT differences and diversity by encouraging fair and respectful treatment of others.
- ACT responsibly and diligently to solve daily situations correctly.
- Be EMPATHIC, putting ourselves in “the other’s” place, to do the right thing with empathy.
- REPORT any misconduct and seek the appropriate channels when in doubt.

## **6. Ethics Committee**

The purpose of the Ethics Committee is to oversee the management of the Code of Ethics at Inteligo SAB.

The main duties of the Ethics Committee include:

- Ensuring compliance with this Code, and the ethics policies and guidelines.
- Reviewing and supervising work initiatives and plans submitted to the Committee.
- Deciding on the actions to be taken and recommending remediations upon breaches to the ethics policies and guidelines.

## **7. Our Commitment**

At Inteligo SAB we are committed to the following:

### **7.1 Diversity, Equal Opportunities and Respect**

We promote fair, equitable and respectful treatment, maintaining an inclusive environment, free of discrimination, harassment, violence or any conduct that violates the dignity and integrity of people.

How do we live our commitment?

- Encouraging honest communications among employees of Inteligo SAB.
- Working as a team, valuing the different opinions and contributions of all.
- Respecting the work environment, our directors, employees, suppliers, customers, clients, users and other stakeholders, and building relationships of trust, maintaining a safe and inclusive environment, with respectful, fair and dignified relationships for all.
- Providing equitable opportunities for professional and salary growth.
- Selecting professionals based on their talent, training, skills and experience.
- Providing remuneration and labor benefits equivalent to those received by employees with the same level of responsibility or workers in the reference labor market, in accordance with the duties and responsibilities assigned to them.
- Recognizing and promoting respect for human and labor rights in line with international standards.

What is prohibited?

- To discriminate on the basis of race, ancestry, gender, age, religion, nationality, academic level, political affiliation, physical disability, marital status, sexual orientation, or any other characteristic.
- Engaging in aggressive and negative verbal or physical behaviors aimed at intentionally hurting, frightening, threatening or excluding a particular person or interest group.
- Carrying out hostile or offensive treatment in the workplace, by any means.
- Imposing and/or allowing any form of forced or compulsory labor, as well as child labor.
- Sexual advances, sexually offensive acts and comments, sexist, indecent or obscene conversations, gestures, comments.
- To become aware of and not immediately report any behavior that violates our commitment to diversity, equal opportunities and respect.

## **7.2 Integrity of financial and non-financial reports**

Our records fully reflect our business, accounting and financial position.

How do we live our commitment?

- Communicating and maintaining agreements, transactions, operations and commercial, financial and non-financial reports in a transparent, accurate, timely, clear, complete and integral manner.
- Reporting financial information, complying with the norms, accounting practices and standards applicable to Inteligo SAB.
- Disclosing full, fair, timely and clear information in our communications, regulatory disclosures and reports filed with our shareholders, directors and regulators.

What is prohibited?

- Falsifying or manipulating in any way, financial and non-financial reports of Inteligo SAB.
- Deliberately providing or recording false or erroneous data.
- Being aware of and not reporting any manipulation or concealment of financial information and/or operational reports of which it becomes aware.

## **7.3 Protection of information and intellectual property**

We protect the information of the directors, employees, customers, suppliers and other stakeholders of Inteligo SAB.

How do we live our commitment?

- Using insider information only for corporate purposes and preventing from using it for other purposes.
- Complying with regulatory and contractual obligations regarding stock exchange secrecy, confidential information and personal data protection.

- Protecting intellectual property and our systems, encouraging the proper use of the information we reproduce or distribute by any physical or electronic means.
- Reserving the right to review and inspect assets used by employees which may include emails, messaging, data and files recorded on Inteligo SAB' equipment or network.

What is prohibited?

- Using, appropriating or improperly disclosing confidential, restricted or privileged information without authorization, including personal data of customers, directors, employees and other stakeholders, as well as information protected by the specific laws and regulations applicable to the securities market sector and in accordance with Inteligo SAB internal policies.
- Using privileged information of the company or customers to obtain undue advantages for one's own benefit or that of third parties.
- Disclose commercial or market strategies, strategic plans and any other information that could jeopardize Inteligo SAB' competitiveness.
- Improper use of access, physical or digital, sharing of keys or passwords that are given in a personal manner for the performance of our duties.
- Deliberately, negligently or carelessly failing to comply with the guidelines on information security, personal data protection, insider trading policies, antitrust or others issued by Inteligo SAB.
- Being aware of and not reporting any misuse or breach of confidential information and/or intellectual property.

#### **7.4 Conflicts of interest**

A conflict of interest arises when personal activities or relationships are incompatible or collide with the objective execution of our duties and/or the interests of Inteligo SAB.

How do we live our commitment?

- Avoiding situations in which our personal relationships or interests may unduly influence the performance of our duties, our business relationships with suppliers, customers and other stakeholders or our work decisions.
- Selecting directors, employees, suppliers and other stakeholders based on their knowledge, experience, merit, reputation, technical and service quality.
- Declaring, consulting and seeking approval from the appropriate leaders in case we identify any situation that may affect or have the appearance of affecting our ability to make the best decisions in the best interest of Inteligo SAB.
- Rejecting gifts and hospitalities from customers, suppliers and/or third parties to avoid any influence in taking objective decisions. Giving gifts and hospitalities must be aligned with the provisions set forth in Inteligo SAB Gifts and Hospitality Guidelines.

- Refraining from making decisions and disclosing any possible conflict of interest related to Inteligo SAB in case we have a family or affinity relationship with a shareholder, director, employee, customer, supplier or other stakeholder.
- Requesting approval from our leaders before accepting a proposal to provide professional services to a public or private entity to avoid conflicts of interest.
- Reporting any irregular behavior that undermines the interests and reputation of Inteligo SAB.
- Maintaining a good credit and financial performance.
- Being aware of and complying with the provisions on Conflicts of Interest set forth in Inteligo SAB Internal Rules of Conduct.

What is prohibited?

- Conducting personal business inside and outside Inteligo SAB offices, that may collide with objective decision-making in the performance of duties.
- Participating in hiring or selection processes involving family members or close persons, that influence objective decision-making.
- Maintaining sentimental relationships with directors, employees or suppliers and other stakeholders with whom there is a direct relationship of control, subordination or report, as well as in other cases in which this may hinder objective decision-making.
- Being in or becoming aware of a conflict of interest and not reporting it.
- Being a shareholder, director or representative of any supplier of Inteligo SAB when your duties are related to the service provided by such supplier.
- Maintain a "poor", "doubtful" or "loss" rating in the credit risk ratings and be over-indebted in the financial system.

## **7.5 Responsible representation of the company and protection of reputation**

We guard the reputation of Inteligo SAB, respecting its values and principles at all times, behaving correctly in the work, social and family environments.

How do we live our commitment?

- Protecting and strengthening the image, reputation, assets and culture of integrity of Inteligo SAB and requiring stakeholders to comply with our ethical standards.
- Developing activities outside company premises in a responsible manner, always safeguarding our reputation, including the responsible use of our personal social media.
- Respecting the right of our employees to participate, on a personal basis, in the activities of different religious, educational, political and other organizations, in which they must always act in a respectful and responsible manner.



What is prohibited?

- Engaging in behavior or spreading statements through physical or digital means, including social media, that harm the image of Inteligo SAB, its directors, employees or other stakeholders, even if done in a personal, social or family sphere.
- Using the image of Inteligo SAB in personal activities of a political, religious, sporting or social nature.
- Being aware of and not reporting any action that jeopardizes the reputation of Inteligo SAB.

### **7.6 Safe and healthy environment**

At Inteligo SAB, we conduct business in a safe and healthy manner, taking care of our employees and other stakeholders.

How do we live our commitment?

- Promoting a safety culture based on prevention, maintaining a safe and healthy work environment for our employees, directors and visitors, complying at all times with the safety provisions established by the external and internal regulations applicable to Inteligo SAB.
- Acting and/or promptly reporting risks or accidents in order to apply the necessary measures in a timely manner.

What is prohibited?

- Engaging in any behavior that jeopardizes the safety and health of employees, directors and third parties in our premises.
- Working under the influence of intoxicating substances or consuming alcoholic beverages during the hours assigned for the performance of their duties.
- To become aware of and not immediately report any behavior by employees or third parties that jeopardizes a safe and healthy environment for all.

### **7.7 Compliance with laws and regulations**

We design our products and services in compliance with the external and internal standards applicable to Inteligo SAB.

How do we live our commitment?

- Complying with local and international regulations applicable to Inteligo SAB.
- Complying with internal policies and guidelines of Inteligo SAB.
- Implementing robust processes and continuous training to prevent any activity related to acts of corruption, money laundering, financing of terrorism and/or other illicit activities.

What is prohibited?

- Deliberately or negligently failing to comply with internal policies and guidelines, as well as any legislation applicable to Inteligo SAB.

- Deliberately or negligently failing to comply with the rules or policies and guidelines issued by Inteligo SAB to prevent acts of corruption.
- Making an offer to a representative of the public or private sector with the aim of obtaining favorable treatment.
- Offering or making, on behalf of Inteligo SAB, donations or political contributions to positions or acts carried out by candidates, parties or political organizations.
- Being aware of and not reporting any indication or act of corruption.

### 7.9 Antitrust

We conduct our business, committed to respecting free and fair competition, promoting innovation and continuously improving our products and services.

How do we live our commitment?

- Respecting our competitors without referring to their brands in a negative or derogatory manner.
- Developing our business, setting prices, commissions and commercial aspects independently from our competitors.
- Competing fairly and honestly, based on our ethical principles and in compliance with the rules that regulate antitrust.

What is prohibited?

- Taking advantage of a dominant position in the market in which Inteligo SAB operates or making agreements with other companies to manipulate marketing conditions, commissions or other commercial conditions.
- Obstruct in any way our competitors or misuse the reputation, image or intellectual property of other companies.
- Engaging, allowing or becoming aware of, and failing to report any anti-competitive behavior.

### 7.10 Honesty

We are convinced that we will achieve our mission and vision by acting with honesty in any situation that may arise.

How do we live our commitment?

- Rejecting any dishonest act such as fraud, theft, misappropriation or misuse of Inteligo SAB resources, directors, employees, customers, suppliers and/or the general public.
- Acting with integrity and transparency in our daily decisions and actions.

What is prohibited?

- Concealing information, carrying out frauds, falsifications, providing false information, generate or taking advantage of errors or omissions in procedures, systems or virtual means to obtain benefits for themselves or in favor of third parties.

- Competiendo de manera justa y honesta, en base a nuestros principios éticos y en cumplimiento de las normas que regulan la libre competencia.

¿Qué está prohibido?

- Tomar ventaja de una posición de dominio en el mercado en el que opera Inteligo SAB o realizar acuerdos con otras empresas para manipular condiciones de comercialización, comisiones u otras condiciones comerciales.
- Obstruir de cualquier manera a nuestros competidores o utilizar indebidamente la reputación, imagen o propiedad intelectual de otras empresas.
- Realizar, permitir o tomar conocimiento y no reportar cualquier conducta anticompetitiva.

### 7.10 Honestidad

Estamos convencidos que lograremos nuestra misión y visión actuando con honestidad frente a cualquier situación que se nos presente.

¿Cómo vivimos nuestro compromiso?

- Rechazando cualquier acto deshonesto como fraude, robo, apropiación ilícita o uso indebido de recursos de Inteligo SAB, de los directores, colaboradores, clientes, proveedores y/o del público en general.
- Actuando con integridad y transparencia en la toma de decisiones y acciones del día a día.

¿Qué está prohibido?

- Encubrir información, efectuar fraudes, falsificaciones, brindar información falsa, generar o aprovechar errores u omisiones en los procedimientos, sistemas o medios virtuales para obtener beneficios propios o a favor de terceros.
- Recurrir a términos o explicaciones ambiguas o engañosas, así como ocultar información relevante para la toma de decisiones informadas.
- Hurtar, sustraer dinero o bienes de Inteligo SAB, clientes, colaboradores, proveedores y otros grupos de interés. - Utilizar de manera indebida los bienes asignados por Inteligo SAB para uso personal o de terceros o para fines ajenos a sus labores.
- Incitar a colaboradores, proveedores o clientes a realizar actos deshonestos o fraudulentos.
- Tomar conocimiento y no reportar cualquier acto deshonesto.

### 7.11 Compromiso con la comunidad y el medioambiente

Reconocemos que nuestras actividades generan un impacto en la comunidad y el medioambiente; por ello, estamos comprometidos con generar conciencia ambiental, prevenir impactos ambientales, e impactar positivamente en el entorno en que operamos.

¿Cómo vivimos nuestro compromiso?

- Realizando la medición y monitoreo de nuestra huella de carbono con el objetivo de reducir nuestro impacto.

- Using ambiguous or misleading terms or explanations, as well as concealing relevant information to make informed decisions.
- Stealing, money or assets from Inteligo SAB, customers, employees, suppliers and other stakeholders.
- Improper use of assets assigned by Inteligo SAB, whether for personal use or for the use of third parties or for purposes unrelated to their work.
- Inciting employees, suppliers or customers to perform dishonest or fraudulent acts.
- Being aware of and not reporting any dishonest act.

### **7.11 Commitment to the community and the environment**

We recognize that our activities have an impact on the community and the environment; therefore, we are committed to raising environmental awareness, preventing environmental impacts, and positively impacting the environment in which we operate.

How do we live our commitment?

- Measuring and monitoring our carbon footprint in order to reduce our impact.
- Promoting the responsible use of resources (energy, water and waste).
- Seeking for our participation to generate added value and development in the communities, actively working with stakeholders.
- Evaluating environmental, social and governance (ESG) factors in the projects we invest in, encouraging our clients and stakeholders to move towards socially and environmentally responsible business practices.

What is prohibited?

- Being aware of and not reporting any action that jeopardizes our commitment to the community and the environment.

**Commitment - Code of Ethics**

Our Code of Ethics reflects our commitment to integrity and guides our conduct towards our principles, which is why I,

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hereby confirm that I have received and read this Code of Ethics and commit myself to comply with its guidelines in order to strengthen our value of Integrity.

Likewise, I commit to cooperating with any investigation or evaluation conducted by Inteligo SAB, participating in in-person and/or virtual meetings, and authorizing, providing, and allowing access to, review, and use of all physical or electronic information, whether it is located in any place or in any equipment provided by Inteligo SAB, or where access to tools or electronic communication systems used for the performance of my duties has been configured or installed.

.....  
Firma

.....  
Documento de identidad