

# code of conduct

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# index

## chapter 1

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# introduction

# Introduction

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## our purpose

In Inkia Energy we have a firm Purpose that we put into practice every day: To provide innovative and sustainable energy solutions to develop each home, company, city and country.

**We are proud to say that:  
We are the energy that  
ensures that the world  
never stop.**

This is why we are committed to contribute to the growth of our customers and the development of our communities, something we must achieve by acting in the right way, in keeping with our **Cultural Principles** and the highest ethical standards.

# our cultural principles

This Code of Conduct is based on our Principles. These are:



each partner  
counts

We are aware of the impact of our decisions, we make them appreciating and understanding the needs of the environment and the impact they will have on each of our stakeholders: **customers, shareholders, communities, government institutions and suppliers.**



focused on  
creating value

**We can do more and better.**  
We generate value, through growth, innovation and efficiency.



ethics guide  
our actions

We act with **transparency, honesty and respect.**



we drive  
change

We are always **looking for new ideas** aligned to our purpose. We question ourselves and **we do not conform for the status quo.**



we are an  
empowered and  
responsible team

**We empower our people.**  
We are committed and own our tasks and responsibilities.

**So that the world never  
stops, I do right**

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## **our commitment**

**We are committed to generate trust and offer safety to all those with which we interact in the course of our business.**

To achieve this, we must be transparent and authentic in our interaction with our employees, business partners, shareholders, the communities we serve, and the government agencies that regulate and oversee our activity.

***We accept the personal responsibility to act ethically, transparently and with integrity, complying with the law in each activity we carry out and respecting the jurisdiction in which we operate.***

In Inkia Energy we must always strive to act with the greatest personal and professional integrity, promoting a real culture of compliance and operational excellence. We are vigilant about transparency and ethical behavior; we do not allow that pressure to get results compromises somehow our way to do things.

***Our Code of Conduct sets expectations about our commitment to the company and to all our stakeholders.***

If you have any doubts or queries, you may contact:

- » Your direct supervisor or any member of the management team, the Human Resources area,
- » The Legal area and the Ethics and Compliance area, directly or indirectly through
- » Our Ethics Line.

We ensure complete confidentiality and protection against any form of intimidation or retaliation.

**We invite you to live day by day  
our culture of compliance and to  
demonstrate that in Inkia Energy  
Ethics always Guide Our Actions.**

## chapter 2

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# make the right decision



# Make the right decision

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**Integrity is fundamental for our group. We do the right thing for the world to never stop.**

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**If in the course of your activities you find yourself before a difficult decision that raises doubts or queries, ask yourself the following questions:**

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By acting with integrity, we reflect positively the good name of the companies of our Group in all countries where we operate.

Although in general we know the difference between good and bad, sometimes the problem we face could not have a clear solution. Regardless of the situation, all of us are expected to use good judgment when making decisions and acting on behalf of the Inkia Energy Group companies.

Potentially, you could find yourself in a situation not covered in this Code: a regulation, a law or a group policy that raises doubts about what is right. Each of us must take personal responsibility for our correct performance and for keeping high ethical standards.

1. **Is it aligned with our Purpose and Principles?**
2. **Is it against my responsibilities as Employee?**
3. **Does it involve a violation of the Group's Code of Conduct, a policy or a law?**
4. **Could it damage my reputation or the company's reputation?**
5. **How would I feel if it were publicly exposed, disclosed in the media or in social networks?**
6. **How would I feel if my decision will put physical integrity, the company's assets or people at risk?**

If you find difficult to answer any of these questions, or if the answer is not satisfactory, seek advice or report your concern to

- » Your direct supervisor or to any member of the management team
- » The Human Resources area, the Legal area and the Ethics and Compliance area
- » Directly or indirectly through our Ethics Line

## chapter 3

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# asking for guidance and reporting concerns

# Asking for Guidance and Reporting Concerns

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As Inkia Energy team members, we are responsible for reporting any real or presumed violations of the Code of Conduct, the Policies or Procedures, and for asking for explanation and guidance about ethics, compliance and legal matters.

To seek guidance or report an infringement, real or presumed, you may contact:

1. **Your direct supervisor.**
2. **Management team.**
3. **Human Resources area.**
4. **Legal area.**
5. **Ethics and Compliance area.**
6. **Ethics Line.**

## chapter 4

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# ethics line

# Ethics Line

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To know, inquire, report and denounce any concerns regarding this Code of Conduct, the Group's Policies or Procedures, or the related legal framework, Inkia Energy has an Ethics Line, a channel to which people inside and outside the Group can have access.

Impartially and transparently, the Ethics Line ensures the confidentiality of any information, preserving the identity of the persons involved, if they wish.

Through this line it is also possible to clarify concerns over interpretation and to file reports on possible violations of the Code of Conduct, the Corporate Policies or Procedures and legal matters in general, such as: corruption, bribery, fraud, money laundering, damage to the environment, alteration of accounting records, misuse of the Group's assets, discrimination, unethical behavior, among others.

You can access the Ethics Line through the following channels:

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- **By email to:**  
[inkia.ethicspoint.com](mailto:inkia.ethicspoint.com)
- **Through the Ethics Line website:**  
[inkia.ethicspoint.com](http://inkia.ethicspoint.com)
- **By telephone to the numbers indicated in following table:**

## Country

## Ethics Line

United States

Direct access:  
From an outside line, dial number: **1-844-222-1729**

Argentina

International Toll Free Service (ITFS)  
From an outside line, dial ITFS number: **0800-444-8759**

Bolivia

International Toll Free Service (ITFS)  
From an outside line, dial ITFS number: **800-11-0365**

Chile

Direct access:  
From an outside line, dial the number corresponding to your operator:  
Telmex: **800-225-288**  
Telefónica: **800-800-288**  
Entel: **800-360-311**  
Entel - operator in Spanish: **800-360-312**  
When requested in English, dial: **844-222-1729**

Colombia

Direct access:  
From an outside line, dial number: **01-800-911-0010**  
When requested in English, dial: **844-222-1729**  
From an outside line, dial number: **01-800-911-0011**  
(Operator in Spanish)

El Salvador

Direct access:  
From an outside line, dial number: **800-1785**  
(Operator in Spanish)  
When requested in English, dial: **844-222-1729**

Guatemala

Direct access:  
From an outside line, dial number: **999-9190** (Claro)  
When requested in English, dial: **844-222-1729**

Mexico

International Toll Free Service (ITFS)  
From an outside line, dial ITFS number: **001-844-451-8777**

Nicaragua

Direct access:  
From an outside line, dial number: **1-800-0164**  
When requested in English, dial: **844-222-1729**

Panama

Direct access:  
From an outside line, dial number: **800-2288**  
When requested in English, dial: **844-222-1729**

Peru

Direct access:  
From an outside line, dial number: **0-800-50-000**  
When requested in English, dial: **844-222-1729**

Dominican Republic

Collect call:  
1. From an outside line, contact the local operator.  
2. Request a collect call to number: **503-495-2717**  
The Contact Center will accept all collect calls through an automated message in English.

## chapter 5

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# good faith report and our anti-retaliation policy

# Good Faith Report and Our Anti-retaliation Policy

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Inkia Energy promotes good faith reports and complaints as a mechanism to improve awareness of our compliance culture.

We do not tolerate retaliation against employees who in good faith report their concerns or those who collaborate or participate in the investigation or solution of those concerns.

Good faith means that you honestly consider that your concern is legitimate, even though you are not completely certain it is so. Making a false accusation intentionally is a violation of this Code.

The appropriate corrective actions will be taken against employees promoting or participating in retaliation actions.

If you consider that you have been subjected to retaliation, get in touch with any contact person or channel indicated in the section **“Asking for Guidance and Reporting Concerns”** of this Code.



## chapter 6

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# disciplinary measures

# Disciplinary Measures

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The existence of standards, policies and procedures is an essential condition for our success.

All of us are responsible for their compliance so our organization functions efficiently and in harmony.

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Deviations and violations may involve the imposition of disciplinary measures that, if applied, will serve as corrective element.

It is the responsibility of all Employees to know this Code, the company's policies and procedures, and to seek guidance in case of doubt.

It is the responsibility of every supervisor, manager or person in charge of a human team to inform, guide and prepare their team for the correct application of the organization's rules and standards, their behavior being an example to follow.

The disciplinary measures will be applied, where possible, immediately after the infringement. These must be fair, reasonable and proportional to the infringement, always respecting the legal framework of each jurisdiction and the internal rules and standards of the respective company.

## chapter 7

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# building mutual trust: fair treatment to our employees

# Building mutual trust: Fair treatment to our employees

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We are committed to building and maintaining an inclusive work environment in which the contributions of each individual are acknowledged. All persons are valued, respected and have the same opportunities to reach their full potential.

We do not tolerate discrimination, harassment or retaliation in the workplace. Put in simple terms: everything we do is driven by a positive and inclusive spirit.

## Equal employment opportunities

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Inkia Energy offers employment opportunities to all and does not admit any type of discrimination or prejudice, whether in relation to race, religion, age, sex, ethnicity, political beliefs, nationality, marital status, sexual orientation, physical condition or any other.

In the recruitment, selection and promotion processes, we evaluate candidates for their skills and performance. Hiring first-degree or second-degree relatives and spouses for positions where there is a direct or indirect hierarchical relationship or who are subordinate to the same immediate superior is prohibited.

## Harassment-free workplace

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Inkia Energy is committed to creating and maintaining a culture where all employees can start every day with a sense of purpose and end every day with a sense of achievement.

We do not tolerate any type of harassment; this applies to situations such as: sexual, economic, moral or any other harassment. We condemn situations involving disrespect, intimidation or threat in the relation between employees, regardless of their hierarchical order.

When situations occur in the workplace which make you or other persons feel uncomfortable, or which are contrary to dignity, report them immediately to any contact person or channel indicated in the section "Asking for Guidance and Reporting Concerns" of this Code.

### **Violence-free workplace**

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Inkia Energy is committed to providing a safe and protected workplace, with zero tolerance to violent incidents by or against employees, temporary workers, suppliers, customers or visitors.

Any type of violent behavior is forbidden. These include: threats, physical abuse, harassment, vandalism, arson, sabotage, etc.

Employees must have a safe and respectful behavior at the facilities of the Group companies and whenever they are handling the Group's affairs, regardless of their location.

### **Carrying of weapons**

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Our commitment to a violence-free workplace also includes zero tolerance to possession of weapons within the facilities of the Group companies.

Employees are forbidden to carry weapons (including components that could be assembled to become one) within the vehicles or facilities of the Group companies or while they are handling work-related matters, with the exception of the professionals specifically authorized by the company on the basis of their functions.

### **Alcohol- and drug-free workplace**

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We have the mutual obligation of working under safety conditions, so we can depend on each other to accomplish our objectives.

Drinking alcoholic beverages is forbidden at the facilities of the Group companies or during working hours, as well as the performance of duties under the influence of alcohol.

Also prohibited are the use and/or possession of drugs within the facilities of the Group companies, and working under an altered state as a result of such use.

## Behavior outside the workplace

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Our behavior outside the workplace could affect negatively our Group and project a bad image about our reliability.

As members of the Inkia Energy Group, we must behave judiciously in public environments, whether in professional circumstances or private life situations, acting with prudence and care, without compromising the reputation of the Group companies or one's own personal reputation.

Whether it is an internal or external setting, when participating in events or engagements using the Group's assets or in other situations that allow the identification of Inkia Energy as employer, our behavior must be aligned with our Principles, thus contributing to the acknowledgment of our Group's good image.

## Health and safety

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In Inkia Energy we place safety first in everything we do. Our objectives are: the elimination of risks that may cause incidents or accidents, and the promotion of a culture of safety and protection against occupational diseases.

We promote a culture in which Inkia Energy's employees and subcontracted workers show their personal commitment to the ongoing improvement of the internal safety and the areas of influence where we operate. Protecting our people improves the quality of life of our personnel and contributes to our long term commercial success.

Each one of us must commit to prevent the safety and occupational health risks and hazards. Only through the participation, identification and commitment of every one of us, all the Group companies will be able to become workplaces free from injuries and occupational diseases.

We set clear expectations for ourselves, we give assistance, support, training and we assume the responsibility of understanding and including health and safety prevention measures in our daily tasks.

## Conflict of interest

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When in doubt, seek guidance according to what is recommended in the section **"Asking for Guidance and Reporting Concerns"** of this Code.

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As Inkia Energy employees, we have the responsibility of being loyal to our company and avoid real or apparent conflicts of interest.

### Conflicts of interest arise when:

- The personal interest of an employee may oppose the interest of the Group companies.
- When personal judgment may be influenced or be perceived as influenced in its ability for making objective decisions or for fulfilling responsibilities adequately.
- When an employee uses his or her influence or acts with the purpose of benefitting particular interests that may oppose the interests of the Group companies or that may cause them damages.

### For the purposes of preventing or avoiding conflicts of interest, take into account the following recommendations and guidelines:

- Business relationships with family members and close friends may influence our decisions and undermine our objectivity when making company-related decisions.
- No employee must perform external activities such as consulting, representing or holding positions in organizations with conflicts of interest or doing business with Inkia Energy.
- No business relationships – either the employee's own or through the spouse or direct family members – are allowed with the suppliers or competitors of Inkia Energy companies, assuming that the position held by the employee gives him or her the power to influence transactions or have access to privileged information.
- Overseeing or taking part in the hiring or promotion of a family member must be avoided, as well as holding a position with access to or influence on performance assessments, salary information or any other confidential information related to a family member.
- The best way to reduce or eliminate a conflict and avoid a misunderstanding is to disclose any situation that may potentially be misinterpreted by others. Failure to communicate a potential conflict of interest is a violation of the Code.

## Privileged information

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The use, dissemination or transfer of strategic information, not publicly disclosed yet or confidential, about Inkia Energy, its shareholders, its affiliate companies or its subsidiaries, is strictly prohibited.

The information to which we have access in the course of exercising our functions is critical for our success and for the protection of the assets we operate. Likewise, it is an essential component of our corporate value and brand identity. All of us have the obligation to safeguard the confidential and strategic information, as well as to protect it against any involuntary disclosure thereof or from internal or external threats.

Additionally, we are committed to protecting the personal information of our employees, customers, suppliers and shareholders.

Employees with access to confidential information must protect it from intentional or accidental disclosure. We must carefully restrict physical and electronic access to confidential information and only share it with other persons who are duly authorized on account of their role or position.

## Decisions on personal investments

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As an employee of Inkia Energy, you could be subject to regulations that prevent you from making certain types of transactions relative to buying or selling any securities that Inkia Energy may issue.

Before trading such stock, or security, you should consider if you have access to relevant nonpublic information about Inkia Energy or any company with which we do business, that may affect an investor's reasonable decision to make a transaction, or that may cause a legal breach.



## chapter 8

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# building mutual trust: our business partners and stakeholders

# Building mutual trust: our business partners and stakeholders

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Inkia Energy creates relationships based on trust and respect with all its customers, investors, suppliers, government, communities and all other stakeholders. In order to win and keep that trust, we do business with transparency, legality and integrity.

We do not take part in unfair or corrupt business practices and we have zero tolerance to bribery.

## Our suppliers

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Our suppliers and providers are part of the success of our Group, so we choose them carefully. Our decision to select a supplier is based on fair and objective criteria, such as technical or commercial reasons or other valid business reasons.

In addition, we expect that our suppliers of goods and services share and adhere to our essential values and internal standards, and they apply them to the way they do business.

## Gifts and business courtesies

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Business courtesies are designed to create goodwill and strong working relations between business partners, but they must never be used to obtain a special advantage in a relationship.

Even though a modest exchange can be acceptable, under certain conditions, it is never required for doing business with Inkia Energy, and business courtesies or gifts of any type that could reasonably be perceived as influencing inappropriately a business decision or creating a business obligation for the receiver must never be given. Read the Gifts and Business Courtesies Policy for more information and recommendations on this subject.

Accepting gifts and business courtesies is forbidden. The exceptions to this provision are duly established in the Gifts and Business Courtesies Policy.

## Fair competition

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In Inkia Energy we believe in doing business honestly and with transparency. We will always participate in the market in a fair and legal way. We forbid activities that reduce competition and restrict business, such as: price fixing agreements, bid rigging, market monopoly or territory division.

We will not participate in any activities that disrespect our competitors nor make misstatements about their products or services or about ours. Read the Corporate Free Competition Compliance Policy for more information and recommendations on this subject.

## Fraud prevention

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The employees that intentionally misrepresent or hide facts or documents relative to our business, or that help others do it, will have committed fraud.

Fraud compromises the integrity of our financial report, the safety of our assets and the integrity of our business. If you know or suspect a fraud, you must report it immediately through the channels indicated in the section "Asking for Guidance and Reporting Concerns" of this Code.

## Building trust with the government

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Inkia Energy respects the legislation and the authorities of all government agencies in all the countries where it does business.

Our operations are subject to many laws, norms and regulations. Violation of those norms –whether deliberate or not – may affect the Group's operations, financial stability and reputation.

For this reason, all of us must understand and comply with the letter and spirit of the laws, regulations and norms applicable to the work and role we perform, as well as the acts we perform and the contracts we enter into on behalf of the Group companies.

We are also committed to cooperating with and responding adequately to the queries or investigations carried out by the government, if required. Before answering any Request for Information, contact the Legal Area or the Ethics and Compliance Area for the appropriate guidance.

## Interaction with public officials

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Inkia Energy interacts periodically with the public officials responsible for the laws, regulations, norms, policies and supervision applicable to the operations of our Group.

Public officials include any government representatives, agencies, government bodies, and also include the elected or appointed officials from foreign, federal, state and local governments, regulatory commissions and other supervisory agencies, as well as candidates to any public position.

We must treat union leaders and representatives as public officials whether or not they are considered as such by the laws of the corresponding jurisdiction.

We must ensure that our interactions and relations with public officials are professional, productive and that they comply with all related laws, mandates, regulations and norms. For more information on this subject read the Public Official Interaction Policy.

## Bribery and corruption

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Bribery is giving or offering something, regardless of its value, to someone to influence a decision. We stand firmly against corruption, in line with our principles and the existing regulatory framework.

We will not tolerate any kind of corrupt activity, nor tolerate said activity committed by a third party on our behalf. This means that we will not pay, give or offer bribes, directly or indirectly, to influence illegally on business decisions, to gain advantages or to compensate the other party for illegal actions.

We comply with applicable international Anti-Corruption laws, such as the US Foreign Corrupt Practices Act (FCPA), the United Kingdom Bribery Act, among others, as well as the local anti-corruption, anti-bribery and crime prevention norms in general, in all the countries where we carry out our operations.

We do not offer or accept bribes, illegal rewards or similar payments. We will never punish an employee for refusing to pay a bribe, even if it means losing business.

Additionally, our prohibition regarding corrupt payments and activities includes bribes or facilitation payments offered or made to persons of the private sector or to local or foreign public officials.

For more information on this subject, read the Anti-Corruption and Anti-Bribery Policy.

### **Entertainment trips and gifts to public officials**

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Entertainment trips and gifts to public officials are prohibited. Any exception to this provision is duly established in the Public Official Interaction and Business Gift and Courtesy Policies.

### **Participation in political processes**

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No employee can make, on behalf of Inkia Energy, any contribution in the form of money, goods or services, regardless of their value, for political campaigns or political causes of any type.

Inkia Energy respects the individual right of each employee to get involved in civic affairs and to participate in political processes. However, such participation must be during his free time and with his own means.

The use of resources, assets, facilities and image of the Group companies for political, personal or partisan interests of any type is prohibited.

### **Responding to requests for information**

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We are committed to providing complete, accurate and truthful information when responding to requests for information related with our business.

Different government agencies and bodies can also request information and documents from Inkia Energy.

Understanding the aspects involved in these requests and the immediate participation of the appropriate Inkia Energy professionals are necessary to comply with the law, ensure the proper protection of the rights of Inkia Energy and its employees, and deliver accurate and consistent answers to said requests.

If you receive any request for information, ask the Legal Area for guidance.

## Building trust with our communities

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Inkia Energy respects and contributes to the development of the communities within the area of influence of our operations, protecting our environment, using our assets wisely, safeguarding the sensitive information that is in our possession, and communicating with honesty and transparency everything related to our activities.

We recognize the impact we have at a local, national and global scale. We usually work with different stakeholders to improve the quality of life of these communities.

## Preserving our environment

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We are committed to being good neighbors, which means that we respect and honor our role of administrators of our environment.

Sustainability is fundamental for everything we do and the responsible management of our natural resources is of critical importance for a cleaner environment, for the quality of life in our neighboring communities, and for the long term business success of Inkia Energy.

All of us must show a personal commitment to environment protection.

We strive to be leaders in the transition to cleaner and more efficient energy solutions in order to reduce our carbon emissions and other impacts on the environment.

## chapter 9

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# financial integrity, protection of our assets and transparency

# Financial integrity, protection of our assets and transparency

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We must keep complete and exact financial records that accurately reflect the state and results of the Group companies, as well as protect their property, assets and confidential information.

## Books and accurate records

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Regardless of our position, we have the obligation of making sure that the information we provide for operational, commercial, financial and other records is complete, timely and objective. Every time a record is created, we have to ensure that all the information is included and that it is accurate.

## Group assets

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We depend on the assets of our companies to support our daily work. We are entrusted with goods, equipment, assets and facilities so they can be used exclusively for the legal and appropriate purposes of our operations and for carrying out our business. Their use for personal purposes is prohibited.

It is the responsibility of each employee to ensure the good use and conservation of the Group's assets under his or her use or custody.



## Use of the electronic information systems

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The electronic systems and computer resources are available to the employees of our Group for the appropriate performance of their functions.

Their use for personal affairs is permitted, provided that they do not contradict the internal standards and policies, or affect performance of the work.

Sharing, downloading, storing or using obscene, pornographic, violent, discriminatory, racist and/or defamatory content, or content that disrespects any individual or entity, or that is against Inkia Energy's policies and interests, is prohibited. Games and message chains are not permitted either.

No software or program of any type whatsoever should be copied or installed on the company's computers or mobile equipment without prior authorization by the Information Technology area.

The users of the company's electronic systems and computer resources must not expect privacy in their use. Inkia Energy may use and monitor any information transmitted over or stored on these media.

## Intellectual property

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Intellectual property is any creation or innovation used in business and is an irreplaceable asset. All of us have the responsibility to protect our intellectual property and to respect the intellectual property of others. We must comply with all the laws and regulations related with intellectual property, copyright, patents, trademarks and business/industrial secrets.

Any suspicion of misappropriation of intellectual property, unauthorized disclosure thereof, or access to information belonging to our group must be reported immediately to any contact person or channel indicated in the section "Asking for Guidance and Reporting Concerns".

### **Relationship with the press**

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In Inkia Energy we have the commitment to communicating with the public truthfully, consistently and with transparency. Contact with the press or the media will be exclusively made by the spokespersons designated in each company of the Group. Therefore, any contact with media and dissemination of information to media on behalf of Inkia Energy is prohibited.

Employees must not use social media to disseminate unauthorized information of the Group companies or to give opinions on their behalf.

### **The inkia energy brand and reputation**

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Our brand and reputation are some of our most valuable assets. Misuse or loss of said assets could have a serious financial, reputational or image impact.

We must take measures to ensure the integrity of our brand and to live up to the reputation of excellence it represents.

### **Laws and regulations applicable to the group companies**

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Each of us contributes to the reputation of our companies as a conscious and law-abiding citizen. We rely on each other to ensure compliance with the legal and regulatory requirements imposed by the different bodies that govern our industry and protect the public interest.

Our policies and procedures are intended to prevent, detect and respond to potential violations of laws, regulations and norms applicable to Inkia Energy's operations. Individually, we are responsible for understanding the laws, regulations and norms applicable to our functions and the consequences of our actions. The intentional infringement of a norm is not an acceptable option.

**Code of Conduct**  
**Document N° Inkia Energy - P - 01**



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