

supplier's code of conduct

Document N° Inkia Energy - P - 08

This document is the
property of Inkia Energy.
It may not be transferred
fully or partially to outsiders
without Inkia Energy
previously approved.

index

chapter 1

introduction

Introduction

Inkia Energy is committed in being fully compliant with laws and regulations, the care for safety and the environment in its operations and areas of influence. To this end, it promotes respect, ethics and integrity, working conditions and human rights, care for the environment and confidentiality.

Our Company's prestige is based not only on our own conduct, but also on the conduct of those with whom we do business.

Inkia Energy acknowledges that, although its suppliers are independent entities, they are active in its value chain; for such reason, it requires them to know and declare their compliance with its Code of Conduct and with other corporate policies.

This Inkia Energy Supplier Code of Conduct demonstrates our commitment to bring about positive changes in the environment in which we operate and requires our suppliers to comply with these principles, notwithstanding their legal obligation to act in accordance with the applicable law. This is why we encourage and require full compliance with this Code, making them mandatory requirements for our suppliers.

The Suppliers' Code of Conduct does not create additional contractual rights or establish all legal requirements for doing business with or on behalf of Inkia Energy. Each supplier is responsible for knowing, understanding and complying with the applicable rules necessary to maintain business relations with Inkia Energy, as well as the requirements and conditions set out in their contracts or trade agreements.

chapter 2

standards of conduct for suppliers

Standards of conduct for suppliers

2.1. Inkia Energy company policies

Code of Conduct

Suppliers are required to provide strict compliance with the provisions of this Code and with the Inkia Energy Code of Conduct and are responsible for distributing them to their personnel and for training such staff on their contents. In addition, they must ensure that their workers comply strictly with such Codes during the performance of the business or contractual relationship with Inkia Energy, or whenever they are visiting any of Inkia Energy's facilities.

Policies, Procedures and Regulations

Inkia Energy has in place a set of Policies, Procedures, Guidelines, etc., which define its corporate governance.

Inkia will inform its Suppliers about the Policies, Procedures and Guidelines, etc., which are applicable to a given contractual or business relationship. Suppliers have the obligation to be familiar with such provisions and to comply with them in the performance of their contract or business relationship.

Suppliers are also responsible for training their personnel on the contents and provisions of the aforementioned Policies, Procedures and Guidelines, and for ensuring their personnel's compliance with them.

2.2. Ethics

In the conduction of their business and the performance of their obligations, we expect our Suppliers to act with integrity and in an ethical manner.

Ethical requirements include the following aspects:

Legal and Regulatory Compliance

Suppliers must comply with the applicable legal requirements in the jurisdiction where they carry out their activities, avoiding any conduct that, notwithstanding not in breach of the law, might damage the reputation of Inkia Energy or cause adverse consequences for the Group, its affiliates or its environment.

Similarly, it is bound to comply with national and international standards prohibiting bribery, undue payments, corruption and other unfair trade practices and ethical misconducts intended to obtain an inappropriate advantage. They shall also comply with national and international laws on labor and employment and those associated with equal opportunities, immigration, child labor, forced or compulsory labor, working hours, wages and benefits, freedom of association and work environments free from harassment.

Conflict of interest

A conflict of interest is deemed to exist when the Supplier's particular interests conflict or interfere with those of Inkia Energy's. A conflict may arise in relation to Suppliers when:

- The goods or services to be contracted are wholly or partly owned, or under the control, of an Inkia Energy employee or any of its family members.
- They have access to Inkia Energy's private and confidential information, at the same time, provides goods and services to the competition of Inkia Energy.

Prior to the execution of a contract or trade agreement, the Supplier should immediately disclose any potential conflicts of interest to Inkia Energy for its review. If a potential conflict of interest arises during the contractual or commercial relationship, it must be revealed immediately upon becoming aware of it.

For more details, review the Conflict of Interests Corporate Policy.

Conduct and measures against bribery and corruption

Inkia Energy is committed to a policy of zero tolerance for corruption and bribery. To this end, it is implementing programs, prevention systems and internal controls so as to ensure compliance with the letter and spirit of the United States' Foreign Corrupt Practices Act (FCPA), United Kingdom Anti Bribery Act (UKBA), and similar laws embodied in the Convention of the Organization for Economic Cooperation and Development (OECD) on Combating Bribery of Foreign Public Officials in International Business Transactions (OECD Anti Bribery Convention), among other rules of a supranational nature, as well as laws against corruption and bribery and the legal framework applicable in all countries where it does business.

The Supplier must at all times maintain an ethical and respectful behavior, always complying with the aforementioned regulations. This is necessary to ensure and establish legitimate and productive relations with Inkia Energy, its own suppliers and other companies with which it may have relationships. It shall act with honesty and integrity in any interaction and commercial relations with public or private entities in any country in which it operates.

In this regard, the Supplier should establish mechanisms to combat all forms of corruption and bribery in the course of its activities.

This implies the following:

- Not to make or offer, either directly or indirectly, any payment in money, in kind or any other benefit, to any person, natural or legal, regarded or not as a public official:
- » In order to unlawfully obtain or maintain commercial relations or any other advantages.
- » In order to abuse of its influence, whether real or apparent, to obtain from any authority or entity, be it public or private, any commercial relations or other advantage.
- » When it is known that all or part of the money or goods will be offered or delivered, either directly or indirectly, to third parties, for any of the purposes mentioned in the two preceding paragraphs.

Commercial Gifts and Courtesies

- Failure to make facilitation payments or to expedite proceedings, consisting of the delivery of money or anything of value, irrespective of the amount involved, in exchange for securing or expediting the course of proceedings before any judicial body, public administration or official body.
- Specifically, the Supplier will not make, offer or accept, based on the contract with Inkia Energy, any payments in cash, payments in kind, or any other benefit from/to any natural or legal person, in order to obtain or maintain any business or advantage for itself or for a third party.

For more details, review the Anticorruption and Antibribery Corporate Policies and those concerned with Interaction with Public Officials.

Whenever a gift or entertainment is offered in the context of a business relationship, there exists the risk that this may influence or appear to influence a business decision. Exchanging modest gifts and courtesies may be acceptable under certain conditions, but it is not a requirement to do business with Inkia Energy.

It is prohibited to offer or to deliver to the employees of Inkia Energy cash, gifts or business courtesies, except for the following exceptions and provided they are reasonable in costs, frequency and quantity:

- Merchandising articles, regardless if they are directly delivered, or given at public or corporate events.
- Training or corporate events to which Inkia Energy is officially invited.
- Lunches, meals, cocktails and the like, of customary or common practice in the development of commercial relations.

For more details, review the Business Courtesies Corporate Policy.

Conduct and measures against bribery and corruption

The protection of our confidential information and that of our clients, the personal data of our employees and professionals, as well as the exact and confidential information and records essential for the fulfillment of accounting, legal and managerial obligations, are fundamental for the development of activities with Inkia Energy, for which our Suppliers must:

- » Maintain accurate, complete, truthful, timely, transparent and understandable accounting, financial and legal records in accordance with relevant regulations. Suppliers must also observe all applicable laws and contractual requirements when creating, maintaining and removing records that relate to their dealings with Inkia Energy.
- » Respect the intellectual property, business or trade secrets and any other confidential information of Inkia Energy's to which they have access, and do not use or disclose such information to serve interests of their own or those of third parties.
- » Safeguard any information of Inkia Energy that is used in the performance of an ongoing commercial or contractual agreement, which will only be used for legitimate business purposes and in the protection of Inkia Energy's interests.

Use of Assets

Suppliers are required to use the resources of Inkia Energy responsibly. This should only be for legitimate commercial and contractual purposes, ensuring that such remedies are used by duly authorized persons and for the purposes specified in the contractual or commercial relationship established.

Inkia Energy resources are defined as the facilities, equipment, systems, technological assets, information, office and field supplies and inputs owned or provided by Inkia Energy.

Suppliers may not use the name, logo, trademarks or any intellectual property of Inkia Energy's or of the companies from its economic group without the express written consent of Inkia Energy or such companies.

Suppliers, their employees, subcontractors etc., are also prohibited from using Inkia Energy's resources or facilities to request or distribute information or materials not associated with Inkia Energy's activities or businesses.

2.3. Human and labor rights

Inkia Energy is fully committed in being compliant with internationally recognized laws and practices in the field of Human and Labor Rights, such as:

- The protection of the values safeguarded under the Universal Declaration of Human Rights (1948), in conjunction with any related documents, the International Covenant on Civil and Political Rights (1976) and the International Covenant on Economic, Social and Cultural Rights (1976).
- The ten principles set out in the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights.
- Organization for Economic Cooperation and Development guidelines for multinational enterprises.
- Declaration on Fundamental Principles and Rights at Work included in the eight International Labour Organization (ILO) Founded Conventions: Freedom of Association and the Right to Organize Convention (1948), Right to Organize and Collective Bargaining Convention (1949), Forced Labour Convention (1930), Abolition of Forced Labour Convention (1957), Minimum Age Convention (1973), Worst Forms of Child Labour Convention (1999), Equal Remuneration Convention (1951) and Discrimination Convention (1958).

Inkia Energy Suppliers must respect and comply with these laws and practices in the development of their business activities, respecting:

Human Rights

Suppliers support and respect the protection of Human Rights such as these are defined in the aforementioned documents, and ensure that they are not breached either by action or by omission. Inkia Energy Suppliers also respect the human rights of local and indigenous communities in those areas inhabited by these groups, in the performance of their activities.

Labor Legislation and Work Conditions

Suppliers shall comply with labor laws and regulations, respecting all the rights of their workers and of the workers of their subcontractors in accordance with the legislation of the country where they conduct their activities. They shall maintain, with their workers, labor practices that are consistent with the international standards described above. In addition, they should ensure that the working conditions and environment are consistent with applicable national and international labor standards.

Respect for people, equal opportunities, and non-discrimination

Suppliers shall respect the dignity, privacy and any other rights attributed to their workers, avoiding any conduct that intimidates or offends the rights of individuals. Therefore, they shall not promote discrimination in employment based on race, age, gender, marital status, sexual orientation, nationality, social or ethnic origin, ideology or public opinion, religion, physical capacity, state of health, pregnancy or any other personal, physical or social condition of their employees, favoring equal opportunities between them.

Suppliers must also reject any manifestations of sexual violence, sexual exploitation or sexual harassment, of a physical, psychological or moral nature, or any abuse of authority or ill-treatment.

Child Labor and Forced Labor

Suppliers shall make no use of child labor; workers in their organization and subcontractors shall exceed the minimum age for employment established in the relevant jurisdiction.

Suppliers shall ensure and monitor the absence of forced labor in their organization, understanding as such any work carried out under any threat of punishment or reprisal, for which the individual does not volunteer.

2.4. Health, safety and environment

Health and Safety

Security is our priority. Our Suppliers must share Inkia Energy's commitment to providing a safe and healthy workplace, exercising good judgment in their work decisions and applying safe working practices (including the regulatory and specific requirements of each contract and of the incumbent jurisdiction) for all of its activities, safeguarding their employees, contractors, customers and the local environment.

Suppliers must ensure that their employees and those of their subcontractors who carry out activities or are present at the Inkia Energy facility comply with the general and particular requirements of each facility, including prohibitions on the use and possession of illegal drugs or alcohol, restrictions on the carrying of weapons, etc.

In particular, when the activities are carried out at the Inkia Energy facilities, the Supplier should be familiar with all of the health, safety and environmental standards of our Company, and ensure their due compliance by its employees and subcontractors.

Environment

Inkia Energy is committed to the protection and preservation of the environment. Since we are committed to complying with all regulatory requirements, we actively seek Suppliers who share our commitment to environmental protection, the conservation of biodiversity and the sustainable use of natural resources.

Our Suppliers must all environmental protection legislation from the incumbent jurisdiction, as well as Inkia Energy's applicable policies and procedures.

chapter 3

supplier accountability and code compliance

Supplier accountability and code compliance

3.1. Inkia Energy's policies

Supplier's Responsibilities

Suppliers are obliged to distribute and to provide training to all their employees, subcontractors or staff working on their behalf, regarding this Supplier Code of Conduct, as well as the other Corporate Policies, Procedures and Guidelines of Inkia Energy's that may be applicable to them.

Inspections

Inkia Energy reserves the right to carry out inspections, supervisions and audits, including visits to our Suppliers facilities, to verify that their commercial operations meet the expectations mentioned in this code. Suppliers and their employees should cooperate in the event of an audit or inspection.

Breach of the Supplier Code of Conduct

Failure by the Suppliers to comply with the contents of this code may have different consequences for the commercial or contractual relationship with Inkia Energy, depending on the severity of the breach.

Complaints and Non-Compliance

Suppliers, their employees or subcontractors must report any suspected breach of regulations of this code or Inkia Energy's Corporate Policies by employees or suppliers. Complaints can be filed through:

- A notification to your Inkia Energy representative.
- The Inkia Energy's Ethics Line through:
 - » Through the ethics line portal:
<https://inkia.ethicspoint.com/>
 - » A telephone communication to the following numbers:

Country	Ethics Line
Argentina	0800-444-8759
Bolivia	800-11-0365
Chile	Telmex: 800-225-288 Telefónica: 800-800-288 Entel: 800-360-312 When is requested, dial: 844-222-1729
Colombia	01-800-911-0011 When is requested, dial: 844-222-1729
El Salvador	800-1785 When is requested, dial: 844-222-1729
United States	1-844-222-1729
Guatemala	Claro: 999-9190 When is requested, dial: 844-222-1729
México	001-844-451-8777
Nicaragua	1-800-0164 When is requested, dial: 844-222-1729
Panamá	800-2288 When is requested, dial: 844-222-1729
Perú	Telefónica: 0-800-50-000 When is requested, dial: 844-222-1729
Dominican Republic	Request a collect call to USA with your local operator y and dial: 503-495-2717

We encourage open discussion of any questions or concerns about this code or our business relations. Suppliers may raise doubts or concerns with the contacts listed above.

Supplier's Acceptance

To signify their acceptance, the undersigned hereby declare:

- That we have received, know the contents and undertake to comply with and enforce the Supplier's Code of Conduct of Inkia Energy, as well as the Corporate Policies of Inkia Energy applicable to our contractual or business relationship. These provisions also apply to our employees and subcontractors.
- That we know, are aware of and undertake to comply with all relevant laws, regulations and requirements from the jurisdictions where we operate or do business.
That we will inform Inkia Energy about any suspected violations of this Code, of their Corporate Policies or of any rules in general.

- » Name of the Company
- » Name of the Authorized Legal Representative
- » Date and Place