



Code of Ethics and Professional

Conduct

Quanam Federated Companies

Quanam – Uruguay

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1. PREFACE

1.1. About Quanam

We are a federation of signatures whose objectives are innovation and knowledge management for the benefit of our customers and the environment in which we operate. Made up from companies specialized in professional services for consulting and management, whose most valuable capital is the intelligent union of more than 400 specialists, including engineers, analysts, economists, administrators, accountants, statisticians and communication and management change professionals. With this team, tools, methodologies and own systems that are applied in all its actions, we have developed the best practices of business consulting, management and technology and professional services for leading companies in their sector. It is part of our business culture to offer consulting, support and our services through specialists who work in teams, together with our clients, providing support and assistance both within our clients' offices, or in remote modalities. With a vast experience in the market, alongside our Partners and collaborators we have been constantly innovating since 1978, having as a goal the success and improvement of our clients' processes, through the most updated solutions and tools that meet all the challenges of an increasingly globalized economy.

Our professional services could be summarized in the following way:

Permanent introduction of innovative elements and processes in order to increase the competitiveness of our customers.

Important presence at the regional level, in any location in Latin America.

Deep knowledge of leading companies and organizations in your region.

Deep knowledge of world class methodologies, the best practices, techniques and products, as well as the business of our customers and their industries.

Permanent commitment of our professionals with the quality and success of their clients.

Build experiences of value for our clients during the course of our services, combining their knowledge with the technical and industrial contributions of our professionals.

Promote long-term relationships with our clients.

Our Mission

Offer our clients, through innovative solutions, competitive advantages that allow them to conquer and maintain leadership positions in their respective fields of activity, naturally integrating the best of information technology and management and control practices.

Our Vision

Be one of the most respected Companies in America, a leader in the region, always seeking the recognition of our customers and the market, both for the quality and innovation of the professional services offered, and for the commitment we have with the success of customers.

Our Values

Our foundations are asserted in the technical capacity and human values of our professionals. In Quanam, we understand that only if you give the professional a work environment in which they find full personal fulfillment, is that you are going to have professionals of exceptional solvency. Our core values underline the company's commitment to customers, the community and the environment. To achieve our them, we promote ethics, commitment, responsibility, loyalty, empathy and the courage to act accordingly.

This Code of Ethics and Professional Conduct is based on the practices of the Quanam Federated Companies throughout almost four decades of professional practice, as well as, other sources such as the Ethics and Professional Conduct Code of Software Engineering (Version 5.2) according to the recommendations of the *ACM/IEEE-CS Joint Task Force on Software Engineering Ethics and Professional Practices* jointly approved by both, the ACM and the IEEE-CS as a standard in the teaching and in the practice of Software Engineering.

1.2. Introduction to the Code of Ethics

IT (Information Technology) plays a central and growing role in retail, industry, government, medicine, education, expansion and society as a whole. The consultants of the Quanam Federated Companies, that come from the most diverse original professions (such as Engineers and Systems Analysts), contribute through their direct participation or by teaching through the activities of analysis: specification, design, development, certification, maintenance and testing of software systems.

Due to their role in the analysis, design, development, implementation and support of Computer Systems, our Consultants (Engineers and Systems Analysts, Economists and Accountants, Statisticians and Administrators) have significant opportunities to be good or cause harm, or to train or influence others to be good or cause harm. To ensure that their efforts will be used for good, as much as possible, Quanam Consultants must commit to transform the Consulting for Implementation and Support of Business Solutions, based on Information Technology components, into a beneficial and respected profession. In accordance with that commitment, the Quanam Consultants adhere to the following Code of Ethics and Professional Practice of the Quanam federated companies.

The code has **8 principles** related to behavior and the decisions made by the professional consultants, not only in the practice of their profession as educators, administrators, supervisors or policy creators, but also as scholars and students of the profession. These principles point out the ethically responsible relationships in which individuals, groups and organizations participate in the primary obligations of those relationships. The provisions of each principle are illustrations of some of the obligations included in these relationships. These are based on the humanity of the Consultant, on the special care given the fact that people are affected by their work, and on the unique elements of the Consulting Practice of the Quanam Federated Companies. The code perceives its provisions as obligations for any person that identifies itself as a Quanam Consultant or aspires to be one.

The isolated use of individual parts of the Code is not intended to justify errors by omission or commission. The list of Principles and Provisions is not exhaustive. The Provisions should not be read separating the acceptable from the unacceptable in professional conduct in practical situations. The Code is not a simple ethical algorithm that generates ethical decisions. In some situations, the norms may contradict each other or with other norms from other sources. In those cases, in order to act in the best way possible with the spirit of the Code of Ethics and Professional Practice, it is required that the Consultant uses its ethical assessment.

Ethical contradictions can be better addressed through careful consideration of the Principles, rather than blindly relying on detailed regulations. These Principles should influence the Consultants so that they widely consider who is affected by their job; to examine if they and their colleagues are treating every other human with respect; to consider how the public would see their decisions, when this one is informed correctly; to analyze how the less privileged would be affected by their decisions; and to consider whether their actions would be deemed worthy of an ideal professional that works as a Consultant. **"Public Interest" is central to this Code** because in all these assessments the primary concerns are health, safety and public good.

The dynamic and demanding context of Consulting and Information Technology requires a Code that is adaptable and relevant in new situations as they occur. However, even in general, the Code provides support to Consultants and their Managers who must take positive actions in specific cases documenting the ethical position of the profession. **The Code provides ethical foundations** to which individuals within teams and entire teams can resort. The Code helps Quanam's Consultants and teams of Consultants define which actions are ethically inappropriate.

The Code was not only created to identify the questionable nature of the acts, but it also has an important educational function. As expressed in the Code, the consensus of the profession in matters of ethics, is a means to educate both the public in general and aspiring professionals regarding the ethical obligations of all Quanam Consultants.

1.3. Quanam's Code of Ethics

The **ethics** and **conduct standards** detailed in **Quanam's Code of Ethics and Professional Conduct**, that is a part of our Integrity Program, represent the expected behavior of all Officials, Bosses and even of Third Parties that are outsourced to provide business services of the Quanam Federated Companies, for Clients and Goals within the markets in which we operate.

The **Quanam's Code of Ethics and Professional Conduct** defines, in eight **Principles, very clear behavioral standards** that **must be followed** by all our **Consultants** (Staff members and third parties) and **Heads** (Medium and Senior management). These standards are **also available to external public on our website**, especially for our Business partners and Clients.

Our **Code of Ethics and Professional Conduct** is an important communication tool for our **Staff members** and **Third parties** and with the Company as a whole, through which we explain our values and the **expected and prohibited behaviors** within Quanam. Its content generally covers the **values** and the main **rules** and **policies** adopted by Quanam.

For compliance purposes of the legal requirements applicable in each territory, we understand that our **Code of Ethics and Professional Conduct**:

- a) Clarifies the Principles and values adopted by the Quanam Federated Companies with regard to issues of ethics and integrity in its activities of providing consulting services covering the sale, conception, design, construction (development and parameterization), implementation or Implantation and support of Business Solutions based on ICT components (Information and Communications Technologies).
- b) **Mentions the Policies of Quanam** to prevent fraud and illegal acts, especially those that regulate our **relations with the Public Sector**.
- c) **Establishes prohibitions:**
 - c.1) to the acts of promising, offering or giving (directly or indirectly) undue advantages to Public or Private Agents, national or foreign, or to people related to them.
 - c.2) to fraud in bids and contracts with the Government and/or with public and/or private companies, national or foreign.
 - c.3) to the offer of undue advantages to bidders/competitors.
 - c.4) to the hindering of the actions of audit authorities.
- d) **Clarifies** the existence and use of **channels for complaints** and for guidance on Integrity issues.

- e) **Establishes the prohibition of retaliation** to complainants and the mechanisms to protect them.
- f) **Contains forecasts for disciplinary measures** for cases in which the rules and policies of Quanam are violated.

The **Quanam's Code of Ethics and Professional Conduct** was originally inspired by the principles of our **Integrity Program** and similar codes such as the **"Code of Ethics and Professional Practice of Software Engineering"** created according to the recommendations of the **"ACM / IEEE -CS Joint Task Force on Software Engineering Ethics and Professional Practices"** jointly approved by the **IEEE-CS (Institute of Electronic and Electric Engineers - Computer Society)** and by the **ACM (Association for Computing Machinery)** as a standard in the teaching and practice of software engineering.

The code is written **in a clear and concise** way, with easy-to-understand language and can and **must be mandatorily applied by the various audiences of Quanam**. It was created, especially, as a **source of consultation on how to act, decide** and on what basis to support their decisions, for the internal public and, if necessary, for Quanam's business partners, **provided that the Integrity of the business of Quanam is being considered**.

By virtue of this, it is expected that the **Code of Ethics and Professional Conduct** is updated periodically by the **Compliance and Integrity Committee**, with the approval of the Board of Partners, according to the **new needs**, as a result of **legal or regulatory changes, institutional changes** or changes in the **practices and/or business areas** of Quanam in its operating territories.

2. ETHICS AND PROFESSIONAL CONDUCT PRINCIPLES

2.1. Principle 1 –Public Interest

Quanam Consultants must act consistently with the public interest. In particular, Consultants should, whenever appropriate:

1. Accept full responsibility for their own work.
2. Balance their own and Quanam's, the Clients' and the Users' interest with the Public good.
3. Approve services, deployments and software only if they have a well-founded belief that it is safe, meets specifications, passes appropriate tests, and does not diminish quality of life, diminish privacy or harm the environment. The ultimate effect of the work should be to the public good.
4. Alert the right people and authorities about any real or potential danger for the User, public or environment that they have enough indications to be related to the deliverables, devices or related documents.
5. Cooperate in efforts to address matters of grave public concern caused by software, its installation, maintenance, support or documentation.
6. Be fair and truthful in all statements, particularly in public statements, related to software systems or related documents, methods and tools.
7. Consider issues of physical disabilities, allocation of resources, economic disadvantage and other factors that can diminish access to the benefits of software.
8. Be encouraged to volunteer professional skills to good causes and contribute to public education concerning the discipline of Consulting and/or Software Engineering.

2.2. Principle 2 – Client and Quanam

Quanam Consultants should act in the best interest of their Client and Quanam, in consistence with the public interest. In particular, Consultants should, whenever appropriate:

1. Provide services in their areas of competence, being honest and forthright about any limitation of their experience and education.
2. Do not consciously use software or tools that have been obtained or retained illegally or unethically.
3. Use the properties of the Client or Quanam only in the duly authorized forms, and with prior knowledge and consent of the Client or Quanam.
4. Ensure that any document upon which they rely has been approved, when required, by someone authorized to approve it.
5. Keep any information gained in your professional work confidential, provided that such confidentiality is consistent with the public interest and with the Laws.
6. Identify, document and gather evidence and quickly report to the Client or Quanam if, in their opinion, a Project is likely to fail, to prove too expensive, to violate intellectual property law, or otherwise to be problematic.
7. Identify, document and report to Quanam or the Client issues of social concern, of which they are aware, in software or related documents, to Quanam or the client.
8. Do not accept external work that could be harmful for work performed for Quanam
9. Promote no interest adverse to those of Quanam or the Client, unless a higher ethical concern is being compromised; in that case, inform Quanam or another appropriate authority of the ethical concern.

2.3. Principle 3 – Products or Deliverables

Quanam’s Consultants have to guarantee that their products and/or deliverables and its modifications meet the highest possible standards. In particular, Consultants should, whenever appropriate:

1. Strive for high quality, acceptable cost and reasonable schedule, ensuring significant tradeoffs are clear to and accepted by Quanam and the Client, and are available for consideration by the User and the public (when possible, except in situations in which confidentiality is required).
2. Ensure proper and achievable goals and objectives for any project on which they work or propose.
3. Identify, define and address ethical, economic, cultural, legal and environmental problems related to the Projects in which they work.
4. Ensure that they are qualified for any project on which they work or propose to work by an appropriate combination of education and training, and experience.
5. Ensure an appropriate method is used for any project on which they work or propose to work.
6. Work according to professional standards (“good practices”) that are the most appropriate for the task to be performed, departing from these only when ethically or technically justified
7. Strive to fully understand the systems’ specifications and/or software with which they work.
8. Ensure that the specifications of the systems and/or software with which they work meet the requirements of the Users and that they have been properly documented and approved.
9. Ensure the existence of realistic quantitative estimates on the costs, deadlines, personnel, quality and outcomes of all the Projects in which they work or propose to work and provide an uncertainty assessment of these estimates.

10. Ensure adequate testing, debugging, and review of software and related documents on which they work.
11. Ensure the production of adequate documentation, including the significant problems that are discovered and the Solutions adopted, in all the Projects in which they work.
12. Work to develop, install and support software systems and related documents that respect the privacy of those who will be affected by such systems.
13. Be careful to use only accurate data derived by ethical and lawful means and use it only in ways properly authorized.
14. Keep the integrity of the data, being sensitive to outdated or flawed occurrences.
15. Treat all forms of software maintenance with the same professionalism as new development

2.4. Principle 4 – Judgement

Quanam Consultants must have integrity and independence in their professional judgment. In particular, Consultants should, whenever appropriate:

1. Temper all technical judgments by the need to support and maintain human values.
2. Only endorse documents either prepared under their supervision or within their areas of competence and with which they are in agreement.
3. Maintain professional objectivity with respect to any software or related documents they are asked to evaluate.
4. Not engage in deceptive financial practices such as bribery, double billing, or other improper financial practices.
5. Disclose to all concerned parties those conflicts of interest that cannot reasonably be avoided or escaped.
6. Refuse to participate, as members or advisors, in a private, governmental or professional body concerned with software related issues, in which the Consultants, Quanam or their Clients have undisclosed potential conflicts of interest.

2.5. Principle 5– Management & Managers

Managers, supervisors and leaders of the different Consulting Practices of the Quanam Federated Companies shall subscribe to and promote an ethical approach to the management of software design, installation, development and maintenance. In particular, those managing or leading shall, as appropriate:

1. Ensure good management for any project on which they work, including effective procedures for promotion of quality and risk reduction.
2. Ensure that Consultants are informed of standards before being held to them.
3. Ensure that Consultants know Quanam’s policies and procedures for protecting passwords, files and information that is confidential to Quanam or to others.
4. Assign work only after taking into account appropriate contributions of education and experience tempered with a desire to further that education and experience.
5. Ensure realistic quantitative estimates of cost, scheduling, personnel, quality and outcomes on any project on which they work or propose to work and provide an uncertainty assessment of these estimates.
6. Attract potential software engineers only by full and accurate description of the conditions of employment.
7. Offer fair and just remuneration.
8. Not unjustly prevent someone from taking a better position for which that person is suitably qualified.
9. Ensure that there is a fair agreement concerning ownership of any software, processes, research, writing, or other intellectual property to which a Quanam Consultant has contributed.
10. Provide for due process in hearing charges of violation of Quanam’s policies or of this Code.

11. Not ask a Consultant to do anything inconsistent with this Code or with Quanam's Integrity Program.
12. Not punish anyone for expressing ethical concerns about a project.

2.6. Principle 6 – Profession

Consultants shall advance the integrity and reputation of the profession consistent with the public interest. In particular, Consultants shall, as appropriate:

1. Help develop an organizational environment favorable to acting ethically.
2. Promote public knowledge of software engineering and Consulting.
3. Extend Consulting knowledge by appropriate participation in professional organizations, meetings and publications.
4. Support, as members of a profession, other Consultants striving to follow this Code.
5. Not promote their own interest at the expense of the profession, client or Quanam.
6. Obey all laws governing their work, unless, in exceptional circumstances, such compliance is inconsistent with the public interest.
7. Be accurate in stating the characteristics of software systems on which they work, avoiding not only false claims but also claims that might reasonably be supposed to be speculative, vacuous, deceptive, misleading, or doubtful.
8. Take responsibility for detecting, correcting, and reporting errors in software systems and associated documents on which they work.
9. Ensure that clients, and Quanam's supervisors know of the Consultant's commitment to this Code of ethics, and the subsequent ramifications of such commitment.

10. Avoid associations with businesses and organizations which are in conflict with this code.
11. Recognize that violations of this Code are inconsistent with being a professional Quanam Consultant.
12. Express concerns to the people involved when significant violations of this Code are detected unless this is impossible, counter-productive, or dangerous.
13. Report significant violations of this Code to appropriate authorities when it is clear that consultation with people involved in these significant violations is impossible, counter-productive or dangerous.

2.7. Principio 7 – Colleagues

Quanam Consultants shall be fair to and supportive of their colleagues. In particular, Consultants shall, as appropriate:

1. Encourage colleagues to adhere to this Code.
2. Assist colleagues in professional development.
3. Credit fully the work of others and refrain from taking undue credit.
4. Review the work of others in an objective, candid, and properly- documented way.
5. Give a fair hearing to the opinions, concerns, or complaints of a colleague.
6. Assist colleagues in being fully aware of current standard work practices including policies and procedures for protecting passwords, files and other confidential information, and security measures in general.
7. Not unfairly intervene in the career of any colleague; however, concerns for Quanam, the client or public interest may compel Consultants, in good faith, to question the competence of a colleague.
8. In situations outside of their own areas of competence, call upon the opinions of other professionals who have competence in that area.

2.8. Principle 8 – Personnel

Quanam Consultants shall participate in lifelong learning regarding the practice of their profession and shall promote an ethical approach to the practice of the profession. In particular, Consultants shall continually endeavor to:

1. Further their knowledge of developments in the analysis, specification, design, development, maintenance and testing of software and related documents, together with the management of the development process, Installation and support of Business Solutions based on Information Technology components.
2. Improve their ability to create safe, reliable, and useful quality software at reasonable cost within a reasonable time.
3. Improve their ability to produce accurate, informative, and well-written documentation.
4. Improve their understanding of the software and related documents on which they work and of the environment in which they will be used.
5. Improve their knowledge of relevant standards and the law governing the software and related documents on which they work.
6. Improve their knowledge of this Code, its interpretation, and its application to their work.
7. Not give unfair treatment to anyone because of any irrelevant prejudices.
8. Not influence others to undertake any action that involves a breach of this Code.
9. Recognize that personal violations of this Code are inconsistent with being a professional Quanam Consultant.

3. OPERATIONAL ASPECTS

Together with the eight Principles, set forth in the previous chapter, the Code of Ethics and Professional Conduct of Quanam Consultants is composed of a series of operational

instruments, such as the Policies of Quanam, a set of express prohibitions, complaints channels available for Consultants which guarantee anonymity and prevent any possibility of retaliation, as well as disciplinary measures to be applied to Consultants who violate this Code and other procedural aspects detailed in this chapter.

3.1. Quanam's Policies

The **rules, policies and procedures to prevent, detect, avoid and correct irregularities**, based on the **identified risks**, are **coordinated with each other**, making it easy to understand and apply them in the Quanam work routine. **All policies specify their objectives, procedures, target public, frequency, responsible units and ways of monitoring**. These **policies, rules and procedures** are a part of the **Integrity Program** and of the **Executive Recommendations** produced regularly by the Compliance and Integrity Committee with the approval of the Board of Partners.

Some types of **internal controls** used for risk mitigation are **common to several policies**. That is the case, for example, of establishing **levels of approval** for certain procedures, which depending on the degree of risk identified may include up to the approval of the Compliance and Integrity Committee and the Board of Partners.

Hereafter, we present the list of **Quanam's Policies for mitigation of risks** detailed in the **Integrity Program**, mandatory for all Consultants, Managers and Directors of all Quanam federated companies:

1. Market Relations Policy:
 - a. Rotation Regulation
 - b. Reunions Regulation
 - c. Approvals Regulation
 - d. Proposals Regulation
2. Price Policy
3. Bidding Policy
4. Hospitality, Gifts and Present Policy
5. Pre-sale Policy
6. Accounting Records and Controls Policy
7. Third Party Hiring Policy
8. Mergers, Acquisitions and Corporate Restructuring Policy

9. Sponsorships and Donations Policy

3.2. Prohibitions

It is **expressly forbidden** to all Consultants, Supervisors, Managers and Directors of all Quanam federated companies:

1. To Execute any acts of promising, offering or giving (directly or indirectly) undue advantages to Public or Private Agents, national or foreign, or to people related to them.
2. To Practice fraud in bids, competitions and contracts with the Government and/or with public and/or private companies, national or foreign.
3. To offer of undue advantages to bidders or competitors.
4. To hinder the actions of audit authorities.
5. To make any type of philanthropic donation, sponsorship or financing of political parties.

3.3. Complaints Channels

Consistent with our **transparency policy**, Quanam makes widely available resources for anyone to report complaints of potential violations of our ethics and integrity standards. Both our Employees and the Third Parties and Business Partners that bring our ecosystem together have access to computers. For that reason, the simplest and most direct channel is sending an email to our address: [integridad."empresa"@quanam.com](mailto:integridad.) (where "company" must be replaced by the name of each Quanam federated company) which will be automatically redirected to the email accounts of the three members of the acting Compliance and Integrity Committee. It is important to point out that this complaints channel is also accessible for third parties and the external public.

To **guarantee the effectiveness** of this channel, the mandatory rules of Quanam guarantee the protection of the complainant in good faith, accepting, for example, **anonymous complaints** from unidentified e-mail accounts and establishing **the prohibition of any type of retaliation** to complainants. Our rules also include the implementation of **confidentiality procedures**, to protect those who, despite being identified before the Compliance and Integrity Committee, do not want to be publicly known. Complaints can also be made by contacting a member of the Compliance and Integrity Committee, either personally or by phone.

In order to gain the trust of those who have something to report is **crucial** that Quanam complies with the **rules of anonymity, confidentiality and prohibition of retaliation**. **Since transparency in the process confers greater credibility to the procedures**, Quanam assures the complainants the **right to accompany the evolution of the complaint**, through contact and communication with the people appointed for this purpose by the Integrity Committee.

3.4. Procedural Aspects and Disciplinary Measures

If there is any **indication that injurious acts** to the public or private administration, national or foreign, are happening, Quanam will automatically initiate an **internal investigation** conducted by the Compliance and Integrity Committee, which will serve as the basis for the corresponding measures to be taken.

Such indications may reach the Committee by complaint (anonymous or with identification of the person) or by detection through the implemented procedural instruments based on Quanam's Policies and Standards.

If an investigation confirms that an **injurious act has occurred**, involving one of Quanam's Federated Companies, the Compliance and Integrity Committee will promptly inform the relevant authorities, who, without prejudice to the disciplinary measures to be applied, will have the obligation to immediately take measures that ensure the **immediate interruption of irregularities, provide solutions and repair the effects caused**.

In order to avoid the recurrence of problems and the occurrence of new failures, we are constantly trying to improve the Integrity Program by applying **disciplinary sanctions to those involved**. As a means to publicly reinforce Quanam's **non-tolerance** of the **practice of illegal activities**, our inalienable adherence to the **principles of transparency** make the adoption of these measures **disclosed to Officials and Third Parties**.

The **disciplinary sanctions** to be applied to any Consultant, Supervisor, Manager, Director or Third Party (including QBP - Quanam Business Partners) of any Quanam Federated Company, as a consequence of the violation of the provisions of the Code of Ethics and Professional Conduct and/or the Integrity Program, **will be decided by vote of the three members of the Compliance and Integrity Committee** and will vary according to the seriousness of the offense committed pursuant to the judgment of the Committee, in the following cases:

- **General Disciplinary Sanctions:**

- Written **warning** for minor and non-repetitive breaches.
- **Separation** (temporary or definitive) of the Professional in fault (or of the Business Partner) of the activities in which the violation occurred, without dismissal or contractual termination.
- **Dismissal** (in the case of employees) or **Contractual Termination** (in the case of Third Parties and QBP).

- **Pecuniary Disciplinary Sanctions:**

- **Partial annulment of variable remuneration** if the remunerated objective was obtained with the help of the injurious act.
- **Total annulment of variable remuneration** if the remunerated objective was obtained in a decisive way thanks to the injurious act.

An act of violation of the provisions of the Integrity Program and/or the Code of Ethics and Professional Conduct may simultaneously result in a general and pecuniary disciplinary sanction.

In all cases, the investigation of the facts and responsibilities will be done by the Compliance and Integrity Committee, with contributions from the Manager (s) of the Business Unit (s) involved in the case. Other areas of the Quanam Federated Company can be called to make statements (testimonial evidence) and to provide documentary evidence.

In the first case, **with the general disciplinary measures**, the Compliance and Integrity Committee shall decide by a simple majority of its members, with a **term of up to fifteen (15) business days** from the date of identification of the potential occurrence.

In the **second case, with the general disciplinary measures**, the Committee shall call the Manager of the Business Unit for which the Professional or the Business Partner in trial was providing services, to assess the impact on the Client's Business and Quanam, when the temporary separation is determined. In that case, the decision will be taken exclusively by the members of the Compliance and Integrity Committee, unanimously, **with a term of up to twenty (20) business days** from the date of identification of the potential occurrence.

In the **third case, with the general disciplinary measures, and in both cases of the pecuniary disciplinary measures**, the Compliance and Integrity Committee will propose to the **Manager of the Business Unit** to adopt the dismissal or contractual termination measure and/or a pecuniary disciplinary measure, and the latter **will decide whether or not to adopt such measure (s)**. If the decision is contrary to the Committee's recommendation, the matter will be delegated to the General Director who will make the final decision. **The deadline for the decision will be, in this case, of up to twenty-five (25) business days** from the date of identification of the potential occurrence.