



COMPLIANCE PROGRAM

Code of Ethics and Professional Conduct

Board of Partners

Chief Compliance Officer & Compliance Committee

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1. Preamble

1.1. About Quanam

Quanam is a federation of companies that aim to produce innovation and knowledge. Made up of companies specializing in professional services for consulting and management, its most valuable capital is the intelligent union of more than 500 specialists, including engineers, analysts, economists, administrators, accountants, statisticians, data scientists, and communication and organizational change management professionals. With this team and with its own tools, methodologies and systems that are applied throughout its universe, Quanam has been developing the best practices in consulting and professional services for leading companies in their respective segments of action.

Offering attention, consulting, support and specialized services through consultants who work as a team, providing support and sustenance within our clients' companies – or even remotely, is a premise of the Quanam culture.

With vast experience in the market, Quanam has been constantly innovating since 1978 together with its business partners and collaborators, with the goal of success and improvement of its customers' processes, through state-of-the-art solutions and tools that meet all the challenges of an increasingly globalized economy.

The professional services offered by Quanam can be summarized as follows:

- Permanent introduction of innovative elements and processes in order to increase the competitiveness of our customers.
- Significant regional presence, as well as a deep knowledge of leading companies and organizations in the region.
- Deep knowledge of world-class methodologies, best practices, techniques and products, as well as the business of our clients and their industries.
- Permanent commitment of our professionals to quality and customer success.
- To generate valuable experiences for clients during the development of our services, combining knowledge with the technical and industry contributions of our professionals.

- Promote long-term relationships with our customers.

Our Mission

To be one of the most respected companies in Latin America, a leader in the region in which it operates, always seeking recognition from clients and the market, both for the quality of the professional services offered, and for the commitment it has to the success of clients.

Our Vision

To provide its clients, through management systems that are based on the best of information technology, competitive advantages that allow them to conquer and maintain leadership positions in their respective fields of activity.

Our Values

Our foundations are based on the technical capacity and human values of our professionals. At Quanam we understand that you can only count on professionals of exceptional solvency if you provide them with an environment of work in which they find full personal fulfillment. Our core values underscore the company's commitment to customers, the community, and the environment. To do this, 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 over more than four decades of professional practice, as well as on other sources such as the Code of Ethics and Professional Practice 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 approved jointly by the ACM and the IEEE-CS as a standard in the teaching and practice of Software Engineering.

1.2. Introduction to the Code of Ethics

Informatics play a central and growing role in commerce, industry, government, medicine, education, recreation and society as a whole. The Consultants of the Quanam federated companies, from the most diverse original professions, such as Engineers and Systems Analysts, contribute through their direct participation or by teaching in the activities of analysis, specification, design, development, certification, maintenance and testing of software systems.

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

The Code has eight Principles relating to the behaviour and decisions taken by professional consultants, whether in the practice of the profession, as educators, managers, supervisors and/or policy-makers, as well as interns and students in the profession. The Principles identify ethically responsible relationships in which individuals, groups, and organizations participate in the primary obligations of those relationships. The Clauses of each Principle are illustrations of some of the obligations included in those relationships. These obligations are based on the Consultant's humanity, on the special care due to the people affected by his work, and on the unique elements of the Consulting Practice of Quanam's federated companies. The Code prescribes its clauses as obligations of any person who identifies as a Quanam Consultant or who aspires to be one.

The isolated use of individual portions of the Code to justify errors by omission or commission is not intended. The list of Principles and Clauses is not exhaustive. Clauses should not be read as separating what is acceptable from what is unacceptable in professional conduct in practical situations. The Code is not just an ethical algorithm that generates ethical decisions. In some situations, standards may contradict each other or other standards from other sources. Such situations require the Consultant to use his or her ethical assessment to act in a manner most consistent with the spirit of the Code of Ethics and Professional Practice, given the circumstances.

Ethical contradictions can best be addressed by careful consideration of the Fundamental Principles, rather than by blindly relying on detailed regulations. These Principles should influence Consultants to consider broadly who is affected by their work; to examine whether they and their colleagues are treating other human beings with due respect; to consider how the public, when reasonably informed, would view their decisions; to analyze how the less fortunate would be affected by their

decisions; and to consider whether their performances would be judged worthy of an ideal professional working as a Consultant. In all these assessments, concern for public health, safety and well-being is primary; that is, the "Public Interest" is central to this Code.

The dynamic and demanding context of Consulting and Computer Science requires a Code that is adaptable and relevant in new situations as they occur. However, even in its generality, the Code provides support to Consultants and their managers (Supervisors, Managers, Directors and Partners) who must take positive action in specific cases by documenting the ethical position of the profession. The Code provides ethical foundations to which individuals within teams and entire teams can draw. The Code helps Consultants and Quanam's teams of Consultants define what actions are ethically inappropriate.

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

1.3. Quanam's Code of Ethics

The standards of Ethics and Conduct detailed in Quanam's Code of Ethics and Professional Conduct that is part of our Compliance Program, represent the expected behavior of all Officers, Directors and even Third Parties subcontracted for the provision of services by Quanam federated companies to Clients and Prospects in our markets of operation.

Quanam's Code of Ethics and Professional Conduct defines clear standards of behavior, which must be followed by all our Consultants (Officers and Third Parties) and Directors (Middle and Senior Management), and which are also accessible to the external public on our website, especially for our Business Partners and Clients.

Our Code of Ethics and Professional Conduct is an important tool for communication with our Officers and Third Parties and with Society as a whole, through which we make explicit our values and the expected and prohibited behaviors at Quanam. Its content covers, in a general way, the values and the main rules and policies adopted by Quanam.

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

- a) It explains the principles and values adopted by the Quanam federated companies related to issues of compliance, ethics and Integrity in their activities of providing consulting services and managed services covering the sale, conception, design, construction (development and parameterization), implementation – implementation and support of Business Solutions based on ICT (Information and Communication Technologies) components.
- b) He mentions Quanam's policies to prevent fraud and illicit activities, especially those that regulate our relations with the Public Sector.
- c) It establishes express 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 persons related to them.
 - c.2) to the practice of fraud in tenders and contracts with the Government and/or with public and/or private, national or foreign companies.
 - c.3) to the offer of undue advantages to bidders – competitors.
 - c.4) to the obstruction of the actions of supervisory authorities.
- d) It clarifies the existence and use of whistleblowing channels and guidance on integrity issues.
- e) It establishes the protection of identity and the prohibition of retaliation against whistleblowers and those who are summoned to testify in the investigations and determines the mechanisms to protect them.
- f) It contains provisions for disciplinary measures in cases of violations of Quanam's rules and policies.

Quanam's Code of Ethics and Professional Conduct was originally inspired by the principles of our Compliance Program and similar codes such as the "Code of Ethics and Professional Practice in Software Engineering" developed 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 the ACM (Association for Electronics and Electric Engineers). 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 should be applied by Quanam's various audiences. It was conceived, above all, as a source of consultation for the internal public and, if applicable, for Quanam's business partners, on how to act, decide and on what basis to support decisions, provided that Integrity in Quanam's business is being considered.

To this end, it is expected that the Code of Ethics and Professional Conduct will be periodically updated by the Compliance Committees, with the approval of the Board of Partners, in accordance with new needs, as a result of legal or regulatory, institutional changes or changes in Quanam's practices and/or business areas in their territories of operation.

2. Principles of ethics and professional conduct

2.1. Principle 1 – Public Interest

Quanam Consultants must act in a manner consistent with the public interest. In particular, and as appropriate, Consultants shall:

1. Accept full responsibility for one's work.
2. Balancing one's own interests (of the Consultant), Quanam, the Client and the Users with the public welfare.
3. Approve services, implementations, and software only with the well-founded belief that the deliverables are secure, meet specifications, have undergone appropriate testing, and do not diminish quality of life or privacy and do not harm the environment. The final effect of work should be public welfare.
4. Alert the appropriate persons or authorities to any actual or potential danger to the User, to the public, or to the environment, which they have reasonable indications may be associated with the deliverables – artifacts or linked documents.
5. Cooperate with efforts aimed at resolving matters of serious public concern caused by software systems, their installation, maintenance, support, support, or documentation.
6. Be fair and truthful in all statements, particularly public statements, regarding software systems or related documents, methods, and tools.
7. Take into consideration problems of physical impairments, resource allocation, economic disadvantages, and other factors that may diminish access to the benefits of software systems.
8. Be willing to donate their professional skills to good causes and to contribute to public education related to the discipline of Consulting and/or Software Engineering.

2.2. Principle 2 – Customer and Quanam

Quanam Consultants shall act in the best interests of their Client and Quanam, in a manner consistent with the public interest. In particular, Consultants shall, where appropriate:

1. Provide services in their areas of competence, being honest and upfront about any limitations of their experience and education.
2. Not knowingly use software or tools that have been obtained or retained in an unlawful or unethical manner.
3. Use Customer's or Quanam's properties only in properly authorized manners, and with Customer's or Quanam's prior knowledge and consent.
4. Ensure that any document they rely on has been approved by someone authorized to approve it, when required.
5. Maintain in secrecy any confidential information received in their professional work, provided that such confidentiality is consistent with the public interest and with the Law.
6. Identify, document and collect evidence and promptly report to the Client or Quanam if, in their opinion, a Project shows signs of failure, being excessively expensive, violating Intellectual Property Laws, or being problematic in any way.
7. Identify, document and report to Quanam or the Client significant problems for the social interest of which they are aware, related to the software systems or related documents.
8. Do not accept external work that is prejudicial to work performed for Quanam.
9. Not to promote interests adverse to those of Quanam or the Client, except in cases of compromise of an ethical interest; in such a case, inform Quanam or another appropriate authority about the ethical concern.

2.3. Principle 3 – Products or Deliverables

Quanam Consultants must ensure that their products and/or deliverables and their modifications meet the highest possible standards. In particular, Consultants shall, where appropriate:

1. Strive to achieve high quality, acceptable cost, and reasonable delivery time, ensuring that significant commitments are clear and accepted by Quanam and the Client, and that they are available for consideration by the User and the public (where possible, barring situations of required confidentiality).
2. Ensure that goals and objectives are appropriate and achievable in all Projects on which they work or are about to work.
3. Identify, define and solve ethical, economic, cultural, legal and environmental problems related to the Projects in which they work.
4. Ensure the qualifications required for any Project on which they work or are willing to work through the appropriate combination of education, training and experience.
5. Ensure that an appropriate Methodology is used in all Projects on which they work or are willing to work.
6. Work according to professional standards ("good practices"), whenever they exist, that are the most appropriate for the task to be performed, departing from them only when justified by ethical or technical reasons.
7. Strive to fully understand the specifications of the systems and/or software with which they work.
8. Ensure that the specifications of the systems and/or software with which they work have been correctly documented, meet the requirements of the Users and have the appropriate approvals.
9. Guarantee the existence of realistic quantitative estimates of the costs, deadlines, people, quality and results of all the Projects in which they work or are willing to work and carry out an evaluation of the accuracy of such estimates.
10. Ensure compliance with the appropriate testing, debugging, and review activities of software and related processes and documents on which they work.

11. Ensure the production of adequate documentation, including significant problems discovered and Solutions adopted, in all Projects in which they work.
12. Work to develop, implement, and sustain 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, ethically and legally obtained data, and use it only in appropriately authorized ways.
14. Maintain data integrity by being sensitive to outdated or erroneous data situations.
15. Treat all forms of maintenance – sustaining software systems with the same professionalism as in the case of a new development.

2.4. Principle 4 – Judgment

Quanam Consultants must have integrity and independence in their professional judgments. In particular, Consultants shall, where appropriate:

1. Moderate judgments and technical opinions due to the need to support and maintain human values.
2. Validate only the documents with which they agree and that have been prepared under their supervision or within their areas of competence.
3. Maintain professional objectivity in relation to any software system or related documents that they are asked to evaluate.
4. Do not engage in deceptive financial practices such as bribery, overbilling, or other improper financial practices.
5. Avoid conflicts of interest and disclose to all parties involved those conflicts of interest that cannot be reasonably avoided.
6. Not agree to participate as members or as advisors in private, governmental or professional organizations related to problems related to software systems, with which they (Quanam Consultants), Quanam or their Clients have potential undisclosed conflicts of interest.

2.5. Principle 5 – Management & Managers

The Directors, Managers, Supervisors and Leaders of the different Consulting Practices of the Quanam federated companies will adopt and promote an ethical approach in the management of the design, development, implementation and support of software systems. In particular, those who are managing or leading should, whenever appropriate:

1. Guarantee the good management of the Projects in which they work, adopting effective procedures for the promotion of quality and the reduction of risks.
2. Ensure that Consultants are informed of the standards before adhering to them.
3. Ensure that Consultants are aware of the relevant Quanam federated company policies and procedures for the protection of passwords, files, and information that is confidential to Quanam or others.
4. To assign work only after consideration of appropriate contributions of education and experience, combined with a desire to expand such education and experience.
5. Guarantee the existence of realistic quantitative estimates of costs, deadlines, people, quality and results of all the Projects in which they work or are willing to work and carry out an evaluation of the accuracy of such estimates.
6. Attract potential Consultants only using complete and accurate descriptions of employment conditions.
7. Offer fair and adequate remuneration.
8. Do not unfairly prevent another from adopting a better position for which that person is qualified.
9. Ensure that there is a fair agreement regarding the ownership of any software, process, research, documents, or any other intellectual property to which Quanam Consultants have contributed.

10. Openly provide appropriate means and remedies in the event of allegations of violations of Quanam's policies or this Code.
11. Not solicit any Consultant to do anything inconsistent with this Code or Quanam's Compliance Program.
12. Do not punish anyone for expressing ethical concerns about a Project.
13. To defend and promote respect for the principles of equal opportunity in employment and business, regardless of race, social position, religion, ethnic or national origin, color, sex or gender, gender identity or expression, sexual orientation, age, mental or physical disability, mental condition, pregnancy, marital status, ideological or political convictions, or any other characteristic that may cause differences, complying with the applicable laws of protection and practicing these principles even if there are no such legal norms.
14. Promote unrestricted compliance with the legislation applicable to labor rights and the usual good practices in each territory of action, treating employees with respect and consideration, promoting teamwork in constructive and creative work environments, with quality of life, health and safety, also taking care of the updating and evolution of their training in a constant way that allows them to develop fully as professionals and as human beings. humans.

2.6. Principle 6 – Profession

Quanam Consultants will advance the integrity and reputation of the profession in a manner consistent with the public interest. In particular, Consultants shall, where appropriate:

1. Help develop an organizational environment conducive to acting ethically.
2. To promote public knowledge of Software Consulting and Engineering.
3. To disseminate knowledge of Consultancy through appropriate participation in professional organizations, meetings and publications.
4. Support, as members of the profession, other Consultants striving to follow this Code.

5. Not to promote their own interest at the expense of the profession, the Client or Quanam.
6. Obey the Laws governing their work, unless, in special circumstances, such conformity is inconsistent with the public interest.
7. Be accurate in setting out the characteristics of the software systems on which they work, avoiding not only false statements, but also statements that could reasonably be suspected of being speculative, empty, misleading or dubious.
8. Assume responsibility for detecting, correcting, and reporting errors in the software systems and associated documents on which they work.
10. Ensure that Quanam's Clients and their Supervisors are aware of the Consultant's adherence to this Code of Ethics, and the derivations of such commitment.
11. Avoid associations with businesses and organizations that are in conflict with this Code.
12. Recognize that violations of this Code are inconsistent with Quanam's Consultant profession.
13. Express concern for the persons involved when significant violations of this Code are detected unless doing so is impossible, counterproductive, or dangerous.
14. Report significant violations of this Code to the appropriate authorities when it is clear that consultation with persons involved in those significant violations is impossible, counterproductive, or dangerous.

2.7. Principle 7 – Colleagues

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

1. Encourage their colleagues to adhere to this Code.
2. Assist colleagues in their professional development.
3. Fully recognize the work of others and avoid taking undue credit.

4. Review the work of others in an objective, candid, and properly documented manner.
5. Pay due attention to a colleague's opinions, concerns, or complaints.
6. Assist colleagues in their complete updating on new technologies and standards of working practices including policies and procedures for software development, protection of passwords, files and other confidential information, and security measures in general.
7. Not to intervene unfairly in the career of any colleague; however, concerns about Quanam, the Client, or the public interest may compel Consultants to question in good faith the competence of a colleague.
8. In situations outside your own area of competence, solicit the opinions of other professionals who have competence in that area.

2.8. Principle 8 – Personnel

Quanam Consultants will continuously participate in the learning of their profession and will promote an ethical approach in professional practice. In particular, Consultants shall continuously strive to:

1. Improve their knowledge of the latest developments in analysis, specification, design, coding, maintenance and testing of software systems and related documents, as well as in the management of construction processes (development and parameterization), implementation and support of Business Solutions based on Information Technology components.
2. Improve your ability to create secure, reliable, and high-quality software systems at reasonable cost and in a reasonable timeframe.
3. Improve your ability to create accurate, informative, and well-written documentation.
4. Improve their understanding of the software systems and related documents in which they work and the environment in which they are used.

5. Improve their knowledge of the relevant standards and laws governing the software systems and related documents on which they work.
6. Improve their knowledge of this Code, its interpretation and its application in their work.
7. Do not treat anyone unfairly because of irrelevant biases. Avoid any discrimination based on any personal attribute of physical, cultural, origin, health or any other nature and promote a work environment free of harassment, considering the talents and virtues of colleagues and supervised when evaluating them.
8. To avoid and report situations of physical or intellectual abuse, sexual or other harassment, and/or discrimination for any reason, both internally in relation to Quanam's employees and third parties, and externally in relation to prospects, customers, business partners, authorities and any other person.
9. Not to influence others to take any action that results in a violation of this Code.
10. Acknowledge that personal violations of this Code are inconsistent with Quanam's status as a Consulting professional.

3. Operational aspects

Complementing the eight Principles set forth in the previous chapter, the Code of Ethics and Professional Conduct for Quanam Consultants is composed of a series of operational instruments, such as Quanam's Policies, a set of express prohibitions, whistleblowing channels available to Consultants guaranteeing anonymity and preventing any possibility of retaliation, as well as the disciplinary measures to be applied to Consultants who violate this Code and other procedural aspects detailed in this chapter.

3.1. Quanam Policies

The policies, standards, rules and procedures to prevent, detect, avoid and correct the occurrence of irregularities, based on the risks identified, are coordinated with each other, being easy to understand and apply in Quanam's work routine. All policies specify their objectives, procedures, public, periodicity, responsible units and forms of monitoring. These policies, standards, rules and procedures are contained in the Compliance Program and in the Executive Recommendations regularly produced by the Compliance Committee with the approval of the Board of Partners in the circumstances provided for it.

Some types of internal controls used for risk mitigation are common to various policies. This is the case, for example, of the establishment of approval levels for certain procedures, which, depending on the degree of risk identified, may even include the approval of the Compliance Officer, the Compliance Committee, the Management Committee and the Board of Partners.

Below is the list of Quanam's Risk Mitigation Policies detailed in the Compliance Program, which is mandatory for all Consultants, Managers and Directors of all Quanam federated companies:

1. Market Relations Policy:
 - a. Rotation Rule
 - b. Meetings Policy
 - c. Approvals Standard
 - d. Proposal Standard

- e. Licensing and Third-Party Services Proposal Standard
- 2. Pricing Policy
- 3. Bidding Policy
- 4. Hospitality and Gift Policy
- 5. Pre-Sales Policy
- 6. Accounting Records and Controls Policy
- 7. Third-Party Hiring Policy
- 8. Mergers, Acquisitions and Restructuring Policy
- 9. Sponsorship and Donation Policy
- 11. Social and Environmental Responsibility Policy
- 12. Compliance Communications Policy

3.2. Prohibitions

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

1. Performing any act promising, offering or giving, directly or indirectly, undue advantages to a Public or Private Agent, national or foreign, or to a person related to him.
2. Practicing fraud in tenders, competitions and contracts with the Government and/or with private companies, national or foreign.
3. Offering any undue advantage to any bidder or competitor.
4. Hindering the action of supervisory authorities.
5. Make any type of philanthropic donation, sponsorship or financing of political parties.

3.3. Whistleblowing Channels

Consistent with our transparency policy, Quanam makes available widely accessible means so that anyone can report potential violations of our standards in terms of compliance, ethics and integrity. Both our Officers and the Third Parties and Business Partners that make up our ecosystem have access to computers and for that reason the simplest and most direct channel is to send an e-mail to the e-mail account of each Compliance Committee: integridad@quanam.cl, integridad@quanam.com.mx integridad.uruguay@quanam.com integridade.brasil@quanam.com, which will be automatically redirected to the e-mail accounts of the Compliance Officer and the other two acting members of the corresponding Compliance Committee. It is important to note that this whistleblowing channel is also accessible to third parties and the external public.

To ensure the effectiveness of the whistleblowing channel, Quanam's mandatory rules guarantee the protection of the whistleblower in good faith, accepting, for example, to receive anonymous complaints from unidentified e-mail accounts and establishing the prohibition of any type of retaliation to whistleblowers. Our rules also include the application of confidentiality procedures, to protect those who, despite identifying themselves to the Compliance Committee, do not want to be publicly known. Complaints can also be made by contacting a member of the Compliance Committee, either in person or by telephone.

Quanam's compliance with the rules of anonymity, confidentiality and prohibition of retaliation is an essential factor to gain the trust of those who have something to report. In addition, Quanam assures whistleblowers the right to follow the evolution of the complaint, through contacts and communications with the persons designated for this purpose by the Compliance Committee, since transparency in the process confers greater credibility to the procedures.

3.4. Procedural Aspects and Disciplinary Measures

The detection of indications of the occurrence of acts harmful to the public or private administration, national or foreign, will automatically lead Quanam to initiate an internal investigation conducted by the Compliance Committee, which will serve as a basis for the adoption of the corresponding measures.

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

If an investigation confirms that a harmful act involving a federated company Quanam occurred, the Compliance Committee will promptly inform the relevant authorities, which will have the obligation to immediately adopt the measures that ensure the immediate interruption of the irregularities, provide solutions and repair the effects caused, without prejudice to the disciplinary measures to be applied.

Our orientation in this area is to always try to improve the Compliance Program, in order to avoid the recurrence of problems and the occurrence of new failures, applying disciplinary sanctions to those involved. Our unwavering adherence to the principles of transparency means that the adoption of these measures is disclosed to Officials and Third Parties, in order to publicly reinforce Quanam's non-tolerance of the practice of illicit acts.

The disciplinary sanctions to be applied to any Consultant, Supervisor, Manager, Director or Third Party (including QBPs – Quanam Business Partners) of any Quanam federated company as a result of the violation of the provisions of the Code of Ethics and Professional Conduct and/or the Compliance Program will be decided with the vote of the three members of the Compliance Committee and will vary according to the seriousness of the offense committed in the opinion of the Committee. in the following cases:

- General disciplinary sanctions:
 - **Written warning** for minor and non-repetitive breaches.
 - **Separation** (temporary or permanent) of the Professional at fault (or the Business Partner) from the activities in which the violation occurred, without dismissal or contractual termination.
 - **Termination** (in the case of employees) or Contractual Termination (in the case of Third Parties and QBP).
- Monetary disciplinary sanctions:
 - **Partial cancellation** of variable remuneration if the remunerated objective was obtained with the help of the harmful act.
 - **Total cancellation** of variable remuneration if the remunerated objective was obtained in a decisive way thanks to the harmful act.

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

In all cases, the investigation of the facts and responsibilities will be carried out by the Compliance Committee, with input from the Manager(s) of the Business Unit(s) involved in the case. Other areas of the federated company Quanam may be summoned to make statements (testimonial evidence) and to provide documentation (documentary evidence).

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

In the second case of general disciplinary measures (separation), the Committee shall convene the Manager of the Business Unit for which the Professional or Business Partner in court was providing services, to evaluate the impact on the Client's and Quanam's Business in the event that temporary separation is decided. In that case, the decision will be exclusively made by the members of the Compliance Committee unanimously, with a period of up to 20 (twenty) business days from the date of identification of the potential occurrence.

In the third case of general disciplinary measures (dismissal) and in the two cases of pecuniary disciplinary measures, the Compliance Committee will propose to the Business Unit Manager the adoption of the dismissal or 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 shall be referred to the Director-General or the Management Committee, as the case may be, which shall make the final decision. The term for the decision will be in this case up to 25 (twenty-five) business days from the date of identification of the potential occurrence.