

Anti-Bribery and Anti-Corruption Management Policy

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Trust, good faith and loyalty are fundamental values that must be met by all the members of Estudio Giolito, as guiding principles that will extend to their private life, being unacceptable any type of abusive and offensive behavior or contrary to morals and good manners. The members of the company repudiate any attempt or act of bribery at all levels of the organization.

02

The Management grants the anti-bribery compliance officer the authority and independence in the preventive fight against bribery in the organization, with the aim of providing advice and guidance to the staff on the anti-bribery management system and issues related to bribery.

03

The members of the company, representatives and dependents undertake to comply with all the requirements related to customs operations, as established in the regulatory framework of our activity "Customs Code", as well as with Law 27401, which establishes the regime of criminal liability applicable to private legal persons, as well as with all applicable legislation.

04

Transparent and long-term relationships will be cultivated with clients, control and government bodies and everyone with whom they interact. The members of Estudio Giolito may not have commercial ties with clients, suppliers or contractors, unless they are approved by the Management. Any type of discriminatory conduct on grounds such as race, gender, sexual orientation, religion, nationality, physical characteristics and/or marital status is unacceptable.

05

Gifts or favors should never be requested or received from clients, nor from relatives or persons related to clients and interested parties, internal or external, with the exception of those expressly authorized by the Management, and in compliance with the anti-bribery laws that may be applicable to the organization.

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The rendering of **expenses** incurred in representing or attending to company affairs will be duly documented and recorded.

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Any complaint regarding facts that imply a violation of this policy may be channeled to the Management, all reports will be confidential and the Management undertakes to carry out the corresponding investigation. The violation of this duty of confidentiality will be considered a serious offense.

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The Management will analyze any non-compliance and will apply the corresponding **sanctions or measures**, establishing that they may involve anything from an exhortation to review the irregular behavior to dismissal for cause. All this without prejudice to the corresponding patrimonial responsibility.

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It will be considered as a **violation of this policy** the omission of the complaint, of facts or circumstances that allow inferring the commission of an irregular conduct that implies a breach of these norms, in relation to a knowledge of good faith or on the basis of a reasonable belief, in confidence and without fear of retaliation.

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All the members of the organization are committed to complying with the anti-bribery **management requirements**, with the aim of continuously improving the effectiveness of the system, this policy is valid and applicable as of April 1st., 2020.