

CODE OF CONDUCT AND ETHICS

TECNOVA GROUP

(Tecnova Soluciones Informáticas SpA - Chilean Tax ID No. 77.430.680-3

Tecnova Servicios Profesionales Ltda. - Chilean Tax ID No. 77.681.168-8

Tecnova IT Solutiones S.A. - Chilean Tax ID No. 78.287.080-7)

hereinafter also referred to as Tecnova (referring to the Tecnova group of companies)

I. PURPOSE AND SCOPE

TECNOVA values its recognized reputation in the Chilean and regional markets. This requires us to maintain the highest standards of compliance with applicable law and, beyond that, to foster relationships with authorities, customers, suppliers, competitors, agents, and employees in strict accordance with standards of ethics, honesty, and courtesy.

Through this Code of Conduct and Ethics, TECNOVA sets forth the principles that guide its conduct and establishes the standards that all Representatives, Managers, Employees, and Agents, hereinafter referred to as “TECNOVA Members,” must follow so that they perform their duties in accordance with those principles and so that TECNOVA and its members serve as an example for the industry.

Compliance with the Code means not only observing it, but also conducting oneself within the Company and in its business activities in a manner that earns TECNOVA recognition as an organization that understands and fulfills its legal responsibilities. All actions of TECNOVA Members shall be governed by this Code so that the “TECNOVA style” is synonymous with reliability, seriousness, and honesty.

In some cases, local laws may be less restrictive than the principles established in this Code. In such cases, TECNOVA Members must comply with the Code even when local laws are more permissive. Conversely, if local laws are more restrictive than the Code, you must always comply, at a minimum, with applicable law.

In some cases, laws and regulations may be ambiguous and difficult to interpret. In such cases, contact TECNOVA’s legal counsel to ensure that you are complying with the Code and applicable laws and regulations.

For purposes of this Code, “TECNOVA” includes all of its subsidiaries and affiliated companies.

II. TECNOVA VALUES

Our principal values are:

Honesty: We trust in the transparency and proper conduct of our employees and collaborators.

Reliability: We are convinced that every person who is part of TECNOVA is capable of successfully performing their duties.

Commitment: Each of our employees and collaborators is committed to their work, with quality as the primary consideration above all else.

Closeness: At TECNOVA, we believe in establishing and maintaining cordial, reciprocal, open, and warm relationships based on mutual trust.

Flexibility: The dynamic IT market requires us to remain constantly prepared for change; therefore, we must be adaptable to changes in our environment.

Innovation: To be a benchmark in Chile’s IT industry, we must continuously innovate in processes and technologies in order to remain at the forefront of technology.

III. GENERAL STANDARDS

1. USE OF INFORMATION

1.1 TECNOVA Proprietary Information

No TECNOVA Member may use for personal purposes or transfer to third parties any non-public Company information. Such information includes any background information, interpretation, forecast, record, technical report, economic assessment, and financial information originating from TECNOVA, as well as analyses, compilations, studies, and other documents prepared by TECNOVA that contain or reflect such information.

1.2 Use of Inside Information

No TECNOVA Member may use any “Inside Information” for personal benefit. Inside Information means any information concerning TECNOVA, its business, or one or more securities issued by it that has not been disclosed to the market and that, by its nature, could influence the market price of securities issued by TECNOVA, as well as certain facts or background information relating to pending negotiations whose disclosure could harm or benefit the Company’s interests.

Inside Information may include key financial and business data; discussions concerning mergers, acquisitions, or sales; the award or cancellation of a material contract; changes in key management; estimates of unexpected financial results; significant litigation; or any information an investor would consider important in deciding whether to purchase, hold, or sell securities. Any TECNOVA Member with access to Inside Information must keep it strictly confidential and may not use it for their own or another person’s benefit, nor directly or indirectly acquire for themselves or third parties securities about which they possess Inside Information.

1.3 Use of Third-Party Information

TECNOVA must respect third-party information that comes to its knowledge and may use it only for the purpose for which it was provided. Accordingly, unless expressly authorized by the information owner or required by a competent authority, TECNOVA Members may not use information provided by employees, customers, suppliers, competitors, authorities, or any other person for a purpose other than that for which it was provided, unless the information is public.

2. CONFIDENTIALITY

No TECNOVA Member may directly or indirectly benefit from confidential information obtained through their work at TECNOVA.

As a general rule, all information relating to TECNOVA’s business must be treated as confidential. Confidential information includes software, project documentation and other inventions or developments, regardless of their stage, made by or for TECNOVA; marketing and sales plans; competitor analyses; product development plans; pricing; contracts or potential acquisitions; financial or business plans or projections; and information concerning employees, customers, and others. It also includes information received in confidence from current or prospective customers, suppliers, or other TECNOVA business partners.

All TECNOVA Members must safeguard confidential information by not transferring, publishing, using, or disclosing it unless necessary in the ordinary course of business or ordered or authorized by TECNOVA. All TECNOVA Members must also comply with applicable information privacy standards. Materials containing confidential information must be stored securely and shared internally only with employees who need the information, or externally only under an authorized nondisclosure agreement.

TECNOVA employees must take care to avoid inadvertently disclosing confidential information. They must refrain from discussing TECNOVA confidential information in public areas such as public transportation, restaurants, public telephones, or non-private TECNOVA areas such as cafeterias, gyms, and elevators. Employees must be especially careful not to forward outside the Company confidential emails or emails intended solely for internal use.

Just as TECNOVA expects employees to honor their obligation not to disclose confidential information even after leaving the Company, employees are expected to protect the confidential information of their former employers. No confidential information obtained by a TECNOVA employee in prior employment may be brought into or used at TECNOVA.

TECNOVA Members are also expected to comply with all local policies and systems concerning physical office security. Accordingly, TECNOVA Members must not access or attempt to access physical areas or systems without proper authorization, nor permit third parties to access TECNOVA physical areas or systems without prior authorization.

3. FREE COMPETITION

3.1 Free Competition

TECNOVA Members are expected to compete fairly and ethically in all business opportunities. No TECNOVA Member may, individually or collectively, engage in or enter into any act, agreement, or arrangement that prevents, restricts, or hinders free competition, or tends to produce such effects.

3.2 Conduct That Undermines Free Competition

Consistent with applicable law, acts, conduct, or agreements that prevent, restrict, or hinder free competition include, among others:

- a) Express or tacit agreements with competitors, or concerted practices with them, intended to fix sale or purchase prices, limit services, or allocate territories or market shares by abusing the power conferred by such agreements or practices.
- b) Abuse of a dominant market position by fixing purchase or sale prices, tying the sale of one product or service to another, allocating territories or market shares, or imposing similar abuses on others.
- c) Predatory or unfair competitive practices carried out for the purpose of obtaining, maintaining, or increasing a dominant position.

3.3 Gathering Information About Our Competitors

TECNOVA Members are expected to make observations about competitors' activities and products only when such information is based on publicly available data, such as open presentations, public marketing materials, newspaper and magazine articles, advertising, and other public information.

TECNOVA Members must not seek competitor information that is proprietary to the competitor, nor attempt to obtain information illegally or in a manner that violates integrity or any employment, civil, commercial, or confidentiality agreement. TECNOVA Members must never conceal their identities when seeking competitor information.

If, for any reason, TECNOVA Members inadvertently obtain proprietary or confidential third-party information without authorization, they must contact TECNOVA's legal counsel.

4. OFFENSES UNDER LAW NO. 20,393

Law No. 20,393 seeks to prevent bribery, money laundering, terrorist financing, and the handling of stolen property. Offenses addressed by this law include:

4.1 Bribery

Offering or agreeing to give any benefit, economic or otherwise, to a domestic or foreign public official so that the official performs or refrains from performing an act within the scope of their position, authority, and responsibilities, in the interest of the legal entity (company). This is relevant to all public or private procurement processes. See Sections 14 and 17 of this document regarding negotiations, business courtesies, and gifts.

4.2 Money Laundering

Any act intended to conceal or disguise the unlawful origin of certain assets, or to acquire, possess, hold, or use assets knowing that they derive from an unlawful act related to drug trafficking, terrorism, arms trafficking, promotion of child prostitution, kidnapping, bribery, securities markets, bank financing, and other offenses, with the intent to profit, sell, contribute the assets to a company, or pursue any other purpose, where the unlawful or illegal origin of the assets was known when they were received.

4.3 Terrorist Financing

The conduct of a natural person or legal entity that, by any direct or indirect means, requests, collects, and/or provides contributions of any kind for the purpose of facilitating an act of terrorism, whether through goods, money, or any other form of cooperation with activities classified as terrorist.

4.4 Handling Stolen Property

An offense committed by a person who, knowing or being unable reasonably to ignore its origin, possesses on any basis property that has been stolen, obtained through cattle theft, handling of stolen property, or misappropriation, or who transports, purchases, sells, transforms, or otherwise trades such property, even if they have already disposed of it. In simple terms, this offense penalizes acquiring property while knowing, or being expected to know, that it has an unlawful origin.

4.5 Unfair Administration

An offense committed by a person entrusted, by law, order of an authority, act, or contract, with safeguarding or managing another person's assets, or part thereof, who causes that person loss either by abusing powers to dispose of assets on their behalf or bind them, or by performing or omitting another act in a manner manifestly contrary to the interests of the owner of the affected assets.

4.6 Misappropriation

An offense committed by a person who, to the detriment of another, appropriates or diverts money, instruments, or other movable property received on deposit, commission, administration, or under another arrangement that creates an obligation to deliver or return it.

4.7 Incompatible Negotiation / Conflict-of-Interest Transaction

For these purposes, this offense is committed by a director or manager, as well as other persons subject to certain related duties and obligations, and certain family members, of a corporation who directly or indirectly takes an interest in any negotiation, action, contract, transaction, or management activity involving the corporation in breach of conditions established by law.

4.8 Private-Sector Corruption

An offense that penalizes an employee or agent who requests or agrees to receive an economic or other benefit for themselves or a third party in order to favor, or for having favored, the hiring or selection of one bidder over another in the performance of their duties. Conversely, it also penalizes anyone who gives, offers, or agrees to give an employee or agent an economic or other benefit for themselves or a third party so that they favor, or because they have favored, one bidder over another.

4.9 Violations of Measures Ordered by the Health Authority That May Result in Criminal Liability for the Company

Fraudulent receipt of unemployment benefits (Article 14 of Law No. 21,227) and ordering an employee to report to work knowing that the employee is subject to quarantine or mandatory health isolation ordered by the health authority (Article 318 ter of the Criminal Code).

4.10 Organizing, Financing, or Encouraging the Creation and Operation of Private Militias or Similar Groups; Possession of Certain Weapons, Chemicals, or Explosives Without Required Registration; and Similar Conduct

Title II of Law No. 17,798 on arms control.

4.11 Human Trafficking

Recruiting, transporting, harboring, or receiving persons for sexual exploitation, forced labor, servitude or slavery, or organ removal (Article 411 quáter of the Criminal Code).

4.12 Cybercrimes (Law No. 21,459)

The law establishes eight offenses:

4.12.1 Attack on the integrity of a computer system: obstructing or preventing the normal operation of a computer system.

4.12.2 Unlawful access (Article 2): unlawfully accessing a computer system.

4.12.3 Unlawful interception (Article 3): intercepting, interrupting, or interfering with the non-public transmission of information in a computer system, or capturing data contained in computer systems without authorization.

4.12.4 Attack on computer data integrity (Article 4): improperly altering, damaging, or deleting computer data where doing so causes serious harm to its owner.

4.12.5 Computer forgery (Article 5): improperly entering, altering, damaging, or deleting computer data with the intent that the data be treated as authentic or used to generate authentic documents.

4.12.6 Handling unlawfully obtained computer data (Article 6): trading databases obtained unlawfully.

4.12.7 Computer fraud (Article 7): manipulating a computer system to obtain a benefit or cause loss to another person.

4.12.8 Misuse of devices (Article 8): facilitating the fraudulent use of credit or debit cards through programs, devices, or other means created or adapted mainly for committing such offenses or the offenses mentioned above.

5. OFFENSES UNDER LAW NO. 21,595

This law systematizes economic crimes and offenses against the environment, regulates penalties and additional consequences applicable to persons responsible for these crimes, and amends various laws to improve and supplement Chilean economic criminal law.

The Economic Crimes Law establishes four circumstances under which an offense may be classified as an economic crime:

First Category: Offenses under Article 1 that are considered economic crimes in all circumstances.

Second Category: Offenses listed in Article 2 when at least one of the following circumstances applies:

- The act is committed in the exercise of a position, function, or role within a company.
- The act is committed for the economic or other benefit of a company.

Third Category: Offenses listed in Article 3 when at least one of the following circumstances applies:

- A person acting as a principal or accomplice in the commission of the act does so in the exercise of a position, function, or role within a company.
- The act is committed for the economic or other benefit of a company.

Fourth Category: Handling stolen property and money laundering are considered economic crimes when:

- The underlying acts are first-, second-, or third-category economic crimes.
- The underlying acts are offenses included in the second or third category, without necessarily being classified as economic crimes, but the handling of stolen property or money laundering was committed in the exercise of a position, function, or role within a company, or for the economic or other benefit of the company.

Examples of economic crimes include environmental crimes, corruption offenses, tax offenses, fraud offenses, offenses against free competition, industrial and intellectual property offenses, and cybercrimes. The law classifies more than 200 offenses as economic crimes.

6. OCCUPATIONAL HEALTH AND SAFETY

The health and safety of TECNOVA Members is a priority for the Company. TECNOVA's policy is to maintain its facilities in a manner that does not harm the health and safety of its employees. TECNOVA's health and safety policy shall always be preventive.

Every TECNOVA Member is required to take all necessary measures to effectively protect their own life and health, as well as the lives and health of Company visitors and employees, while maintaining appropriate hygiene and safety conditions.

All TECNOVA Members are also expected to comply with TECNOVA policies and applicable health and safety legislation.

7. ENVIRONMENTAL PROTECTION

TECNOVA respects the right to live in an environment free from pollution and, in the development of its operations and policies, seeks to protect the environment, preserve nature, and conserve environmental heritage.

In all their activities, TECNOVA Members must respect the right to live in an environment free from pollution, seek to protect the environment, preserve nature, and conserve environmental heritage.

The use and exploitation of natural resources by TECNOVA Members shall be carried out in a manner that ensures their regenerative capacity and the biological diversity associated with them, especially species that are endangered, vulnerable, rare, or insufficiently known.

8. REJECTION OF HARASSMENT, INCLUDING SEXUAL HARASSMENT

8.1 Harassment

It is TECNOVA's policy to promote mutual respect among workers within the Company and to provide a work environment free from harassment.

Workplace harassment based on race, religion, nationality, gender, sexual orientation, age, physical ability, or any other improper, unlawful, or fundamentally discriminatory ground, expressly including sexual harassment, is unlawful conduct inconsistent with human dignity and contrary to proper coexistence within the Company.

8.2 Sexual Harassment

Improper requests of a sexual nature made by any means, not consented to by the recipient, and that threaten or harm the recipient's employment situation or employment opportunities shall, in particular, be considered sexual harassment.

Improperly making, by any means, requests of a sexual nature that are not consented to by the recipient and that threaten or harm the recipient's employment situation or opportunities shall constitute sexual harassment for all purposes.

9. NO ARBITRARY DISCRIMINATION

9.1 Definition

Arbitrary discrimination consists of any distinction, exclusion, or preference in treatment that, without justification, is based on race, color, sex, religion, friendship or enmity, family relationships, union

membership, political opinion, or any other criterion considered irrational or unjustified, and that has the effect of altering or nullifying equal treatment.

9.2 In the Workplace

TECNOVA supports equal opportunity for its employees without distinction based on race, religion, nationality, gender, age, disability, pregnancy, marital status, or sexual orientation. We uphold this principle of non-discrimination in all aspects of employment relationships, from recruitment and hiring through the entire duration of employment.

Accordingly, TECNOVA Members are prohibited from arbitrarily discriminating among workers in hiring, promotion, or termination decisions.

9.3 Suppliers

The obligation of non-arbitrary discrimination applicable to TECNOVA Members also requires them not to arbitrarily discriminate among suppliers.

9.4 Provision of Services

No TECNOVA Member may unjustifiably deny customers the sale of goods or provision of services offered by the Company.

10. INTEGRITY

10.1 Definition

The principle of integrity that all TECNOVA Members must observe consists of maintaining impeccable professional conduct and performing one's duties honestly and loyally, giving precedence to the interests of TECNOVA and its customers over personal interests.

10.2 Private Activities

TECNOVA Members may not engage in personal activities during hours that wholly or partially overlap with their assigned working hours.

10.3 Examples

Conduct contrary to the principle of integrity includes:

- a) Improperly using one's position to influence a person in order to obtain a direct or indirect benefit for oneself or a third party.
- b) Using TECNOVA money or property, in any manner, for one's own benefit or that of third parties.
- c) Requesting, obtaining a promise of, or accepting, by reason of one's position or duties, for oneself or third parties, gifts, advantages, or privileges of any kind, except those based on protocol or customarily accepted as reasonable expressions of courtesy and good manners.

11. TECNOVA PROPERTY AND DOCUMENTS

11.1 Property and Documents

TECNOVA property and documents made available to Company Members may be used only for the purpose for which they were provided.

11.2 Care

TECNOVA Members must take all necessary measures to care for and protect Company property. This obligation continues even after an employee leaves TECNOVA, including the duty to maintain the confidentiality of trade secrets and other TECNOVA proprietary information.

11.3 Accounting Documents

Any background record, document, invoice, receipt, record, technical report, economic assessment, or financial information originating from or delivered to TECNOVA, as well as analyses, compilations, studies, and other documents prepared by TECNOVA that may have tax implications, must be retained for at least six years.

11.4 Other Documents

All other records and documents not included in the preceding paragraph must be retained for no less than two years.

12. INDUSTRIAL AND INTELLECTUAL PROPERTY

12.1 Definition

Industrial Property includes trademarks, patents, utility models, internet domain names, software, industrial drawings and designs, layout designs or topographies of integrated circuits, geographical indications, designations of origin, and any document or manuscript eligible for registration.

12.2 Ownership

Any Industrial or Intellectual Property created by a Company Member in the performance of their duties shall be owned by TECNOVA.

No TECNOVA Member may dispose of or appropriate in any manner Industrial Property created for the Company. Each TECNOVA Member is responsible for protecting TECNOVA's industrial and intellectual property rights.

Likewise, TECNOVA respects the industrial and intellectual property of others. It is contrary to TECNOVA policy to reproduce software, documentation, or other materials protected by industrial and intellectual property laws without authorization. In performing their duties and/or using TECNOVA property, TECNOVA employees may not upload content protected by industrial or intellectual property rights to external or internal websites or other electronic forums without first obtaining authorization from the owner.

13. PARTICIPATION IN POLITICAL ACTIVITIES

TECNOVA believes in freedom of opinion; therefore, any TECNOVA Member may participate in political activities provided that such participation does not interfere with the normal performance of their duties.

14. NEGOTIATIONS AND REPRESENTATION OF THE COMPANY

14.1 Relationships with Third Parties and Public Officials

In their relationships with third parties and public officials, TECNOVA Members may act only within the scope of their authority. Accordingly, every TECNOVA Member must strictly adhere to the authority entrusted to them and to the terms of this Code.

Negotiations with third parties conducted by TECNOVA Members must take place within the applicable legal framework and in an environment of fair competition, while also respecting the ethical principles that guide commercial activity.

As part of the actions that, individually or collectively, may form part of crime-risk scenarios, the Company has established ethical rules for reporting, analyzing, and determining situations that may give rise to conflicts of interest.

From the hiring process and throughout the performance of their duties, employees must disclose any situation that may give rise to an actual or apparent conflict of interest. Failure to comply with rules concerning conflicts of interest shall be considered serious misconduct subject to disciplinary

consequences. Such disclosures must be reviewed and updated if a conflict is subsequently identified after the initial conflict-of-interest declaration.

In addition, if an executive conducts business with a customer counterparty, any Company executive, supervisor, employee, or collaborator who, in dealings with domestic or foreign public officials, has or believes they may have a conflict of interest is required to report it.

All conflict-of-interest reports must be submitted to the People and Organization area, which is responsible for the corresponding analysis and handling in accordance with established rules.

Every public procurement process must comply with the public procurement law in effect at the time and observe the formal rules, processes, and timelines established for each procurement.

14.2 Contracts

No contract, or amendment to a contract, that is material to the Company as described above may be signed by a TECNOVA Member without prior approval from the Company's legal representatives.

Authorization to sign a contract or subsequent amendments must be obtained before the contract is performed, modified, or amended.

Before purchasing any good or service or making any other commitment on behalf of TECNOVA, the TECNOVA Member(s) involved must ensure that they have authority to incur expenses equal to or greater than the total amount of payments or other concessions for which the employee could commit TECNOVA.

15. EXCLUSIVITY

Every TECNOVA Member must devote appropriate attention to the work entrusted to them and maintain an ethical commitment to their role. Accordingly, during or outside working hours, they may not perform work for TECNOVA competitors, nor perform work independently or through third parties for TECNOVA customers.

They must also always respect the duty of confidentiality applicable to all TECNOVA Members regarding Company information that comes to their knowledge and must respect the Company's intellectual and industrial property.

16. DRUGS AND ALCOHOL

TECNOVA Members are prohibited from entering the workplace or working while intoxicated, under the influence of drugs or narcotics of any kind, or in a health condition incompatible with their duties. Bringing alcoholic beverages, drugs, or narcotics of any kind into the Company, consuming them, or providing them to third parties is strictly prohibited.

17. BUSINESS COURTESIES AND GIFTS

TECNOVA recognizes and understands that, in both public and private business relationships, it is customary to give and/or receive business courtesies, including, for example, lunches up to a maximum value of 50,000 per person, entertainment, discounts, gifts up to a maximum value of 20,000, use of equipment, and similar items. However, the Company supports such courtesies only when they meet the requirements and conditions stated in this section.

When inviting a customer to lunch, authorization must be requested, the purpose of the meeting must be stated, meeting minutes must be prepared, and spending ranges must be defined according to the profile of the customer representative invited.

Accordingly, all TECNOVA Members are prohibited from giving and/or receiving business courtesies of any kind that do not strictly comply with the characteristics described here.

17.1 Receipt of Business Courtesies and Gifts

TECNOVA recognizes the custom of accepting business courtesies, within the limits of sound judgment and common sense.

No TECNOVA Member or immediate family member may accept a business courtesy that:

- a) could influence, or appear to influence, the TECNOVA Member's ability to make business decisions based solely on the interests of the Company;
- b) exceeds the customary range of business courtesies offered in similar circumstances in the industry and under local law or local custom; or
- c) consists of cash or cash equivalents, including bonuses, gift certificates, discounts, gift cards, or similar items.

If there is any doubt as to compliance with these requirements, TECNOVA Members must decline the courtesy and seek authorization from their direct manager. A legal representative must request written authorization from the Company's legal counsel.

If a TECNOVA Member accepts an inappropriate business courtesy without prior consultation, that Member shall be accountable for the decision.

17.2 Giving Business Courtesies and Gifts

No TECNOVA Member may directly, or through a third party, give or offer a business courtesy to an individual employee of a supplier, customer, or other public entity with which TECNOVA does business unless the courtesy is of such low value that it cannot reasonably be viewed as intended to improperly obtain a business objective.

In all cases, any business courtesy given must strictly comply with the conditions stated above for receiving such courtesies.

IV. PROCEDURE IN THE EVENT OF NONCOMPLIANCE WITH THE CODE OF CONDUCT AND ETHICS

All TECNOVA Members must report any conduct, whether their own or that of another TECNOVA Member, that violates this Code. Reports must be submitted through the Company's anonymous reporting portal at <https://www.tecnova.cl/denuncia/>, providing all details necessary to enable an investigation.

Upon learning of a potential violation of this Code, TECNOVA will open an internal investigation and will strictly protect the confidentiality of the information and persons involved, except where disclosure is absolutely indispensable and necessary for the investigation.

Likewise, if any TECNOVA area becomes subject to a judicial or administrative investigation, TECNOVA Members are required to cooperate fully to facilitate the investigation.

All TECNOVA Members must cooperate with the investigation and provide all background information necessary to promptly clarify the matter under investigation.

V. REQUIREMENTS FOR PARTNERS

Given the nature of Tecnova's services, in some cases partners (business partners) must be engaged in order to address all customer needs. Accordingly, this Code of Conduct and Ethics also applies to partners and must be read by the representatives of the partner company and all employees assigned to the service subcontracted by Tecnova.

Tecnova's supplier and partner onboarding procedure requires the following records:

- EERR (the source text indicates that this acronym should be defined)
- Declaration of disqualifications/ineligibilities
- Declaration of partners/shareholders
- Declaration of adherence to the Code of Conduct

- NDA

The submitted records must be reviewed annually to determine whether they require updating.

The supplier must adhere to the Code of Conduct; therefore, all supplier personnel will be evaluated in the same manner as a Tecnova Member.

For each service for which a supplier is engaged:

- a) There must be a contract between the parties.
- b) The supplier must sign:
 - An integrity agreement
 - A declaration of no incompatibility
 - An NDA

The person responsible for this procedure is the Head of Finance, Alejandra Marchant, who will request and collect the required records and submit the supplier onboarding request, together with all collected documentation, to the General Manager.

VI. AUDIT PROCESS

Verónica Chamorro is appointed Crime Prevention Officer. The Officer shall oversee:

- Delivery of the Code of Conduct to all personnel.
- Testing personnel's knowledge of the Code of Conduct through the Virtual Classroom, incorporated into the Company's onboarding process.
- Review of minutes from previous Ethics Committee sessions.
- Monthly review to:
 - Ensure compliance with and dissemination of the Code of Conduct.
 - Detect corrupt acts.
 - Identify process weaknesses and improvements and propose them to the Ethics Committee.
 - Preparation of minutes of Ethics Committee sessions.
 - Identification and implementation of continuous improvements to the Crime Prevention Model.
 - Compliance with supplier registration and evaluation requirements, including requesting all required documentation.
 - Proper dissemination of risk areas and the conduct required within the scope of each company.
 - Monitoring conduct in risk areas through appropriate analyses.
 - Adoption of all disciplinary measures agreed upon to sanction noncompliance with established standards.
 - Proper operation and dissemination of the Criminal Risk Prevention Model, and coordination and management of supervision of compliance with the controls established in it.
 - Reporting to the Ethics Committee periodically, at least every six months, on all material activities related to the Model, as well as any violation of which the Officer becomes aware.
 - Proposing to the Ethics Committee the review of the Company's most relevant policies and procedures concerning prevention of criminal risks.
 - Assessing whether ethical rules and other internal protocols and manuals are adequate, and ensuring their dissemination and compliance.
 - Directing and coordinating activities in this area across the various areas of the Company.

The Administration and Finance area has a duty to record and identify purchases and reimbursements by Tecnova Members that may lead to an investigation by the Ethics Committee.

The People area must provide the necessary training to all personnel joining the Company and identify potential employee conflicts of interest involving prospective customers.

VII. ETHICS COMMITTEE

The Ethics Committee is intended to replace the role of the Company prosecutor and shall consist of:

- Verónica Chamorro, Crime Prevention Model Officer
- Sebastián Portales, Company Attorney
- Alex Lagos, General Manager
- Juan Carlos Duran, Finance Manager
- Francisco Valdés, Technology Director

The Committee's functions are to:

- Receive anonymous reports submitted through Tecnova's website.
- Investigate and impose sanctions where appropriate.
- Adjust and improve procedures when necessary.

The Committee must meet during the first week of January and July, when it will receive a report from the Model Officer. It must also meet whenever a report is received, in which case the Model Officer must convene the Committee.