



## **CONDUCT AND ETHICS POLICY PRODATA ENERGY C.A.**

### **1) OBJECTIVE**

To establish and make known the Conduct and Ethics Policy, through the guidelines established by PRODATA ENERGY.

### **2) SCOPE**

The Conduct and Ethics Policy applies to all PRODATA ENERGY personnel, contractors, subcontractors, suppliers and visitors of the company.

### **3) DEFINITIONS**

Ethics: Set of customs and norms that direct or value human behavior in a community.

Conduct: The way a person behaves in a given situation or in general.

### **4) DESCRIPTION OF THE PROCESS**

Within EXCELLENCE, one of the fundamental values of PRODATA ENERGY, is the ethical behavior in everything we do. PRODATA ENERGY is committed to ensure the integrity and reputation of the company, its employees, customers and other stakeholders, cognizant of the importance of preventing cases of conflict of interest, self-benefit, favoring third parties, breach of confidentiality clauses, manipulation of information or any other conduct related to the Code of Conduct and Ethics.

The following standards define the basic rules of ethical behavior, without limitation (see Code of Conduct and Ethics). Failure to comply with any of these rules is considered a **SERIOUS OFFENSE**. Once the offense has been established, the respective sanctions will be applied according to Article 79 of the Organic Labor Law (LOTTT). In addition, the company will take the respective legal actions according to each case.

1. No employee of the company shall offer or give monetary or material benefit to a client or third party in order to favor or influence the award of a business or contract (see the exceptions and limits established in the Anticorruption Policy).
2. No employee of the company may solicit or receive monetary or material benefit from a supplier or third party in order to favor or influence the award of a business or contract.
3. No employee may take any action to favor himself/herself or any third party against the benefit of the Company, and must always act within the framework of the applicable law.
4. No employee shall alter, falsify or change information relevant to the customer or the company. All employees must ensure the probity and reliability of the work provided by PRODATA ENERGY.

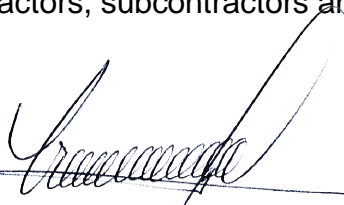


5. No employee shall violate the confidentiality clauses of the company and disclose internal information to third parties, in particular competitors, for any reason, and even after leaving the company, if applicable.

6. All employees must inform the company of any conflict of interest that may exist. Reporting the existence of close relatives or similar relations working for a competitor or an existing or potential supplier is a priority.

#### **4.1 GENERAL PROVISIONS**

The Conduct and Ethics policy must be posted in visible places in the office, stations and work fronts; it must be made known and disclosed to company personnel, contractors, subcontractors and visitors.



Roberto Villalba  
**President**