

CODE OF ETHICS

DOCPATH GROUP

INTRODUCTION

The Code of Ethics of DocPath Group, hereinafter referred to as “DocPath”, serves as a guide for professional conduct of all its members within a global, complex and ever-changing environment, reflecting DocPath’s commitment with the principles of ethics and transparency in all its areas of action.

This document sets forth a set of principles and guidelines for conduct aimed at guaranteeing DocPath’s ethical and responsible behavior in the development of its activities.

SCOPE

The principles and guidelines of conduct included in the present Code of Ethics apply to all DocPath members, regardless of their hierarchical level and geographical or functional location. The application of other codes of ethics or conduct, either specific of a business area or derived from the national legislative regulations of the countries in which DocPath is operating, do not exempt DocPath professionals from compliance with the present Code.

DocPath professionals, acting as DocPath representatives at organizations, associations, foundations or other entities, will observe the Code of Ethics while performing such activities and will encourage application of DocPath’s values and standards of conduct within those organizations, associations, foundations or other entities managed by DocPath. The present Code of Ethics, by its nature, does not cover all possible situations. However, it establishes guiding criteria for the general behavior of all DocPath members, and, where appropriate, for the resolution of any doubts that may arise in the development of DocPath’s activities.

CORPORATE VALUES

The Corporate Values, which are listed below, constitute the basis of this Code and establish general guidelines for action, which must be taken into account by all DocPath members throughout their professional activities.

- Responsibility and respect towards any Client commitments, always taking into account the Client's expectations.
- Encouraging further development of our professional talent by creating a sense of commitment and belonging.
- Supporting cooperation and professional growth through teamwork.
- Integrity, honesty and ethics: professionalism and transparency in all internal and external operations, in accordance with our Code of Ethics.
- Quality: Maintaining a spirit of overcoming and continuous improvement while performing our professional tasks.
- Innovation: Striving for creativity and flexibility in order to anticipate our Clients' needs.
- Social responsibility towards individuals, the environment and the community, by balancing social and environmental sustainability.

PRINCIPLES AND GUIDELINES FOR CONDUCT

The present Code adopts the following basic assumptions:

- Ethics among shareholders, owners, directors and management are essential for a 21st century enterprise to adequately meet its objectives, being this a key requirement to secure and balance the rights and obligations of all groups involved: employees, clients, shareholders/owners, providers, business partners and the society at large.
- Ethics presuppose strict compliance, within and by the company, with the legislation applicable in each case, as well as with the Corporate Bylaws and Internal Operating Regulations, if applicable.

- Ethics within the company require that the shareholders/owners guarantee that managers and executives will comply with their obligations.
- The company's General Management will be responsible for drawing up the Code of Ethics and distributing it to all employees of the Group.

SHAREHOLDERS AND OWNERS

In the exercise of their ownership rights, they should:

- Configure their company as an instrument at the service of creating wealth, ensuring that their objective of generating profit is compatible with social and environmental sustainable development, in order for all activities to be performed in an ethical and responsible manner.
- Configure the company as a medium and long-term entity, not compromising its continuity by interest in short-term enrichment.
- Exercise voting rights in an informed and responsible manner, at the General Shareholders' Meetings and, in doing so, always demand ethical behavior by the company, including approval of the Code of Ethics and effective application thereof.
- Pursue a fair balance between capital and work, in such a way that workers receive just compensation for their work through their salaries.
- Appoint as Directors and Managers individuals who meet the requirements regarding adequate preparation and experience, and who perform their management functions in a professional, ethical and responsible manner.

DIRECTORS AND MANAGEMENT

In the exercise of their administrative and management functions, they should:

A) In relation to their **Management functions**:

- Carry out their activities in a professional, ethical and responsible manner.

- Comply and demand compliance with the Code of Ethics of the company and, to that end, make the Code known and establish appropriate mechanisms to guarantee application.
- Periodically and accurately inform owners or shareholders of the company's current situation and prospects.
- Promote effective participation by shareholders/owners at the General Meetings, especially by facilitating the exercise of information and voting rights.
- Comply and demand compliance with generally accepted accounting standards and principles, and establish internal and external risk management and control systems in accordance with the characteristics of the company.
- Maintaining the company's records and ledgers accurately and honestly, to allow information to be obtained and decisions to be taken in an informed and responsible manner.
- Provide external and internal auditors of the company with all such information and explanations as may be required to carry out their tasks.
- Subordinate their own interests to those of the company when acting on behalf and in representation thereof and not use corporate assets in their own benefit, except with due transparency, prior authorization from the relevant corporate body and in exchange for consideration deemed appropriate on the market.
- Immediately notify the administrative body as to any event or situation which would represent or could give rise to a conflict between the interests of the company and the individual interests of the director or manager in question, and abstain from intervening in the resolution.
- Facilitate transparency of and control over their remuneration, in such a way that it is guaranteed to be appropriate to their level of responsibility and performance and to the characteristics of the company.

- Maintain as confidential background, data and documents to which they have access by virtue of their functions in the company, even when they no longer carry out such functions.
- Make payment and comply with debts incurred by the company without unjustified delays or breaches, and collect on due balances with the diligence required in each case.
- Prepare and maintain in place a succession plan for key positions within the company, to ensure that continuity of the company does not depend on the presence of any given director or manager.
- Choose their collaborators and subordinates in accordance with the principles of merit and capacity, looking only to fulfill the interests of the company.

B) In relation to **suppliers and clients** of the company:

- Maintain an ethical and licit relationship with suppliers of goods and services.
- Search for and select only those suppliers whose business practices respect human dignity, comply with the law and do not entail a risk for the company's reputation.
- Select suppliers based of the appropriateness of their products or services, as well as of their prices, delivery conditions and quality, not accepting or offering gifts or bonuses, in cash or in kind, which could alter the rules of free competition in the production and distribution of goods and services.
- Aspire to excellence in the goods and services of the company in such a way that the expected client and consumer satisfaction is obtained.
- Guarantee the products and services of the company and quickly and efficiently addressing consumer and user claims, in order to achieve satisfaction levels that go beyond mere compliance with applicable legislation.

C) In relation to **competitors** of the Company (**Market**):

- Not abuse of a dominant or privileged market position.

- Compete in good faith with other companies, cooperating to achieve a free market based on mutual respect between competitors, and abstaining from unfair practices.
- In particular, not attract clients from competitors via unethical methods.

D) In relation to **employees** of the Company:

- Treat employees with dignity, respect and justice, taking into consideration their different cultural sensitivities.
- Not discriminate against employees on the grounds of race, religion, age, nationality, sex or any other personal or social condition different from the conditions of merit and capacity.
- Not allow any form of violence, harassment or abuse at the workplace.
- Recognize employees' rights of association, union membership and collective negotiation.
- Encourage professional development, training and promotion of employees.
- Link remuneration and promotion of employees to merits and capacities.
- Establish and communicate clear criteria and rules in order to maintain a balance between the rights of the company and those of employees, in hiring and leaving processes, even in the case of a voluntary change in employee.
- Guarantee health and safety of employees, taking any such measures as are considered reasonable to maximize prevention of occupational risk.
- Facilitate reconciliation of work, family and private life at the company.
- Pursue occupational integration of individuals with disabilities or handicaps, eliminating any barriers in the company environment to ensure their insertion.
- Facilitate the participation of employees in corporate social action programmes.

E) In relation to the **General Partnership**:

- Respect human rights and democratic institutions, and promote them wherever possible.
- Attain the principle of political neutrality, with no political interference in communities where their activities are developed, and in demonstration of respect for the viewpoints and sensitivities of all individuals involved in the company.
- Maintain a licit and respectful relationship with public authorities and institutions, not accepting or offering gifts or bonuses in cash or in kind.
- Only make contributions to political parties or public institutions in accordance with applicable law and, in any case, guaranteeing transparency.
- Collaborate with public and non-governmental entities and organizations dedicated to improving the level of social focus on the most disadvantaged.

All the above commitments, far from constituting a mere statement of principles, are being applied daily and are fully integrated into the day-to-day management of DocPath in all its areas of activity.