



Code of Ethics

Professional Responsibility and
Transparency





Message from the Board of Directors

Dear employees:

Since its inception, it has been essential for the organization to maintain a high level of professional ethics in all its relationships, whether it is among its own partners, as well as with its collaborators, customers, suppliers and communities in which we have a presence.

These practices have distinguished us and granted us the recognition and reputation we have today. It is the responsibility of each one of us to preserve it, making proper decisions and acting correctly, within the framework of the law and professional responsibility.

An ethical professional conduct based on high principles of integrity is what will allow us as individuals to earn the respect, trust and consideration of other people.

We have reflected in this Code of Ethics the rules that should always guide the behavior of the organization's members inside and outside of the office. Through this document, those of us who are part of the organization, will have at our disposal a guide that will provide us the elements for decision making in matters of ethics.

In addition, this Code reflects our commitment as signatories of the United Nations Global Compact, to align our policies and operations to the principles of the Covenant in the areas of human rights, fair work, the environment and anti-corruption.





Specifically, we are committed to:



Human rights	Principle 1	▶ Support and respect the protection of internationally proclaimed human rights.
	Principle 2	▶ Not be complicit in human rights abuses.
Fair Work	Principle 4	▶ Eliminate all forms of forced or compulsory labor.
	Principle 5	▶ Abolish child labor effectively.
	Principle 6	▶ Eliminate discrimination when it comes to employment and occupation.
Environment	Principle 7	▶ Support preventive methods with regard to environmental problems.
	Principle 8	▶ Adopt initiatives to promote greater environmental responsibility.
Anti-Corruption	Principle 9	▶ Encourage the development and diffusion of harmless technologies for the environment.
	Principle 10	▶ Work against corruption in all its forms, including extortion and bribery.

We recommend its careful reading, and making this Code your reference manual, which can be consulted whenever you have questions about how to carry out or frame your actions.

We all share the benefits of the good reputation of our organization. We also share the responsibility to preserve and protect it. Therefore, all its members must comply with the rules established in this code. We thank you for your cooperation.



A look to our Code of Ethics

This code was created with the purpose of helping the organization's employees to understand the ethical responsibility they have when representing the organization. It has been organized in different sections according to the commitments we have with: our employees, our clients, our providers, the government and the community.

You may encounter situations that are not described in this Code or for which the organization does not have a specific policy. If that is the case, ask yourself the following questions that will help you make the right decisions:

- *Do my actions violate the law or professional ethics?*
- *Am I being fair and honest?*
- *Would I feel embarrassed if my colleagues, friends or family knew I did this?*
- *Could my actions damage the reputation of the organization if they were published?*
- *Could my actions cause physical, emotional or other harm to another person?*
- *Could my actions be perceived as inappropriate by a third party?*

If after answering these questions you feel uncomfortable or insecure about any of them, you need to seek guidance.

What are the penalties for code violations?

Every employee must know and comply with the norms established in this Ethics Code. Managers will oversee that they do. Any violations of our Code, our policies or the law may result in different internal disciplinary sanctions depending on the severity, notwithstanding any civil or criminal cases that may correspond:

- a. Verbal admonition.
- b. Written warning that will be part of the employee's file.
- c. Dismissal. The employer may terminate the employment relationship by justified dismissal when the employee incurs any of the offenses listed in Section A of Article 213 of the Labor Code.

Prior to the application of a disciplinary sanction, the employee shall have the right to be heard. Those responsible for the violations can also be subject to civil or criminal penalties, depending on the misconduct.

Keep in mind that you are responsible for both what you do and what you observe or find out about others doing. If you do not report a violation, you may be subject to disciplinary action, even if you were not directly responsible for the action. This applies especially to those who maintain supervisory responsibilities.

The organization has high expectations of all its employees, particularly those in managerial positions. They are expected to lead by example and promote an environment in which all employees are familiar with the Code and are comfortable doing so.



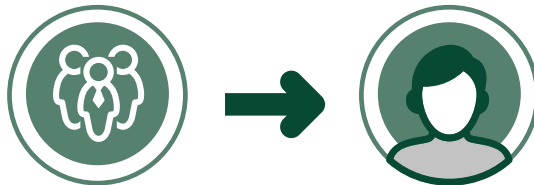
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At the organization, we seek to attract and retain the best talent in the market, so we treat our employees with dignity and respect, and promote an environment of communication, honesty, openness and development.

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Our commitment to our employees



- a. Provide equal employment opportunities, without discrimination of race, disability, social class, sex, sexual orientation, religion or political ideas.
- b. To regulate our actions based on respect for the laws, human rights, and respect for the dignity and integrity of the people who work here.
- c. Maintain and expand, within our possibilities, the benefits that our members receive in addition to the salary, to help improve their quality of life and that of their family members.
- d. Not allow any type of harassment at the workplace. Psychological, verbal, sexual or any other type of harassment is not allowed, coming from any person who works or not in the organization, towards another employee, client, supplier, visitor or anyone who is in the facilities of the n or who performs business with us.
- e. To provide our members with working conditions in an adequate, healthy environment and adopting the security measures established in Article 283 of the Labor Code.
- f. Constantly ensure that there is a generational change that minimizes the risk of the timely or untimely exit of the managing partners.
- g. Ensure that all employees receive formal feedback on their performance at least once a year.
- h. Provide training opportunities to all our lawyers, executives and collaborators that are appropriate for their role and responsibilities.

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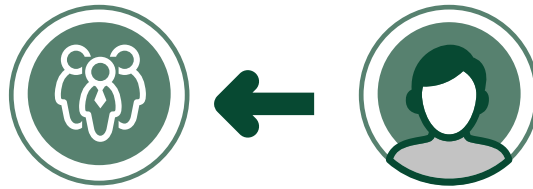
*The staff of this organization
is distinguished by its
commitment and constancy to
business ethics and policies.
Practice day to day, the values
of the organization.*

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Employee commitment

with the organization



- a. Perform their duties in an efficient and responsible manner, using the time that they are working for the organization in a productive manner and contributing to achieving The organization's objectives, committing to fulfilling its vision and preserving the corporate culture.
 - b. Base their behavior on principles of integrity and professional ethics. Fraud, deceit, theft, defamation, bribery, extortion, dishonesty, falsehood, corruption, misuse of the organization's resources or any act or conduct that could qualify as a breach of ethics is not allowed.
 - c. Always present themselves to work in mental and physical conditions that are suitable for executing the work established in their work contract, in addition to visibly carrying the personal identification card while they are inside company offices.
 - d. Fulfill faithfully the existing norms and policies regarding security.
 - e. Promote a healthy and responsible lifestyle, free from alcohol and substance abuse.
 - f. Without being experts in legal matters, know and respect the laws, norms and customs of every country in which they operate. The members of the organization, without exception, must know and comply with all the policies, rules, norms and procedures established in the organization and those referring to their work.
 - g. Do not disclose confidential information about the organization, its customers, partners and employees.
 - h. Know the clients and perform a due diligence process before providing services. Desist from doing business with those whose activities violate the law or whose source of funds is suspicious.
 - i. Do not offer, give, request or accept gifts, invitations or other similar benefits with the intention of obtaining business or influencing the decisions or business matters of the client or our own behavior.
- The appropriate business courtesies are not considered bribes. To ensure that the exchange of corporate courtesies is not



considered a form of bribery, such courtesies must meet the following requirements:

- Be of an appropriate value (maximum USD 250.00) and comply with applicable laws.
- Be congruent with the policies of the company that gives as well as the one that receives.
- Not be offered or accepted with the intention of obtaining or retaining business, or improperly influencing business matters or the decisions of a company, or our own behavior; and
- Appropriately approved and informed to your supervisor.

In any case, common sense must be used to determine if what is proposed may be contrary to these principles. If in doubt, try to get guidance.

- j. Do not accept a position of director (or other fiduciary role) of any entity (whether client or not) that could generate personal or indirect responsibility for the organization without prior written permission.

Use of social media

The company protects the personal information of its employees, executives, attorneys, clients, providers, contractors, and any other individuals with whom it has relations, with a high degree of confidentiality and with the application of administrative and technological procedures to safe keep those records.

- k. Avoid conflicts of interest when representing a client and notify clients in the event of a conflict.

Conflicts of interest arise when the interest of the people working for the organization interferes with the interests of the organization. If you are not sure that a certain personal interest poses a conflict, you should consult with your supervisor, so that you can clarify whether or not it is a conflict of interest.

Conflicts of interest may also arise when the organization's relationships with its customers, suppliers, government, community or other entities may be affected by unilateral decisions that any of the organization's members have not duly consulted with senior management or the Management Committee of the organization.

- l. Use technology and social networks appropriately:

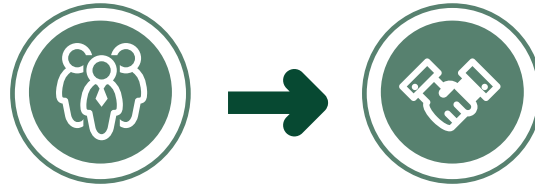


At the organization, we seek to offer our clients a professional and quality service. The relationships with our clients are based on transparency, respect and mutual trust, essential conditions that have enabled the organization's growth, recognition and international expansion.





Our commitment to our clients



- a. Offer a professional, high quality and timely service, offering each client the products and services that best suit their needs;
- b. Be transparent, particularly in the case of the information we provide to clients on the characteristics of the products and services we offer, without hiding, in each case, their risks, commissions and other costs;
- c. Comply with the commitment acquired. If due to unanticipated or unforeseen circumstances we cannot comply with that commitment, we are obliged to inform our clients immediately, following the procedures established in the organization.
- d. Respect the established agreements and invoice charges in an ethical manner. Any modification to the original agreement must be settled with the client.
- e. Be updated about the products and services we offer.

- f. Be confidential. Our customers believe in us to a great extent because of the trust they have that we will treat in a confidential manner the information they share with us.

As an organization, we depend on the strict confidentiality of business, administrative, legal, commercial and financial secrets to which we can have access. This information should not be disclosed to the public or to any person who has not been authorized and it is everyone's responsibility to protect it.

The confidential information that the members or managers of the organization have authorized to deliver to third parties must always be in writing by means of a Confidentiality Agreement or Commitment. If it is justified or authorized to transmit confidential information to other members of the organization, the person to whom it is transmitted must be warned that this is confidential information.

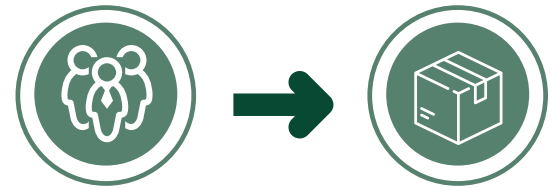
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The organization's relationships with its suppliers are based on integrity, respect and mutual benefit. The organization provides equal opportunities to its suppliers for the offer of its products or services, taking into consideration that in each case the loyalty is achieved through the satisfaction with the brand or service, credibility and trust that is generated during the development of these relationships.

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Our commitment to our suppliers



Relations with suppliers will be governed by the following basic principles:

- a. Respect the agreements or contracts established
- b. Process claims with respect and in search of solutions that satisfy the interests of the organization. If the solution is difficult, the supervisor should be informed
- c. Refrain from conducting business with suppliers that have affected the organization through deception or caused loss or damage to the service or product acquired or contracted.
- d. The confidential or privileged information of the organization that is required to provide suppliers for the presentation of their proposals must have the authorization of the directors, partners or senior executives of the organization, and the delivery of this information must be in writing, by signing a Confidentiality Agreement.
- e. Members of this organization shall refrain from receiving gifts, perks, discounts, illegal commissions in their personal capacity, in exchange for concessions or granting preference to a product or service that is detrimental to the organization. Promotional items or courtesies offered by suppliers can be received and reported to the supervisor, as long as it does not condition the negotiation. Any good or service that does not exceed USD 250.00 of estimated value is considered a promotion or courtesy item. Once this estimated value has been exceeded, the supervisor must choose to reject the offer or deliver it to OD for donation or allocation.
- f. All suppliers selected by the organization must have gone through the selection procedures of the purchasing department, similarly completing the self-diagnosis of CSR and the process of fiscal and / or regulatory compliance. The organization has an Integrity Guide that indicates the guidelines to be followed by the Suppliers and is part of the contract signed with them.
- g. They must be willing to be reviewed by the Audit Vice Presidency in order to validate the veracity of the information provided in the self-diagnosis and the services billed to The organization.

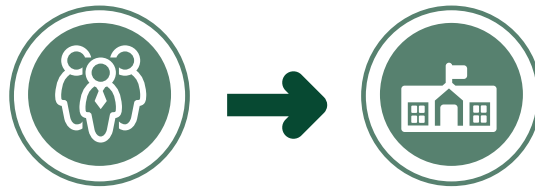


The organization's relations with the government and other public institutions in the countries in which we carry out operations are based on compliance with the rules, regulations and applicable legislation in each of those countries.





Our commitment to the government



The basic principles on which our relations with the Government are based are the following:

- a. Respect for laws and compliance with existing regulations and standards in the countries in which the organization maintains operations;
- b. Compliance with the payment of taxes that correspond according to the existing tax legislation in each country;
- c. Obtainment of all the requirements corresponding to permits, licenses and approvals for the development of the organization's commercial activities;
- d. Not allowing bribery or payment of kickbacks, perks, gifts or any type of illegal concession to public officials, be it economic or of any other kind of compensation, in order to obtain concessions of any kind;
- e. Compliance with all laws against money laundering. We do not participate or facilitate transactions that involve income that we know or suspect comes from criminal activities, such as terrorism, drug trafficking and fraud.

In order to avoid attracting customers that may represent reputational or legal risks, it is the obligation of all organization's members to

comply with the Compliance program, which guidelines are dictated by the the organization's Board of Directors. In those jurisdictions where the organization conducts regulated operations, the Know Your Client Policies will be fulfilled in accordance to the regulatory standards of the jurisdiction and the organization.

The Compliance department and / or the person to whom this responsibility is assigned to in each office of the organization, will be responsible for ensuring that the organization is not affected in its reputation, legally or operationally, by suspicious activities of the clients in regards to money laundering or financing of terrorism.

The Compliance department will be responsible for designing and implementing a Know Your Customer Policy based on the highest global standards and applying the procedures manuals that are prepared for this purpose.

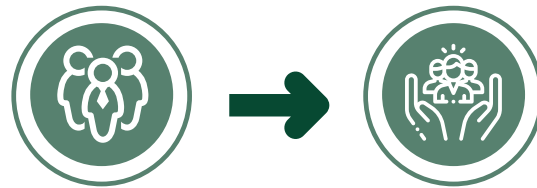
- f. Carrying out financial transactions with transparency and in compliance with legal provisions. The financial operations are covered by the Generally Accepted Accounting Principles and / or International Financial Reporting Standards and the controls that the organization maintains for the preservation of its financial integrity.



- g. The organization respects the rights of its partners and collaborators to participate in political activities or make political donations in a personal way, as long as they do not interfere with the duties and responsibilities undertaken with the organization. The organization shall not make contributions, whether economic or any kind, to political parties or candidates for public posts of local or national governments. Collaborators may not use the organization's facilities, resources, logos, or any other symbol that may be associated with the organization for political activities.
- h. Sponsorships and donations must be made through FUNDAMORGAN y be aligned to one of its two axes of action (education and access to justice). If the request does not impact those axes, it will have to be evaluated by the senior management and authorized in that instance.



Our commitment to the community



Since its founding in 1923, the organization has been committed to the welfare of society, formalizing this commitment with adherence to the United Nations Global Compact in 2001 and the adoption of the international quality standard ISO 26000 that regulates and guides in matters of CSR and encourages companies to incorporate a socially responsible dynamic in their businesses.

In line with the above, the organization has designed its CSR policy with the following pillars: Corporate Wellbeing, Corporate Standards, Environment and Community. In the latter, their actions are channeled through **FUNDAMORGAN**, which has two axes of action: **EDUCATION AND ACCESS TO JUSTICE**.

Sponsorships and donations must be made through FUNDAMORGAN y be aligned to one of its two axes of action (education and acces to justice). If the request does not impact those axes, it will have to be evaluated by the senior management and authorized in that instance.

The organization will promote the participation of its staff, lawyers and executives in corporate volunteering and will provide its support, preventing these activities from affecting the normal development of their work, and will make sure that contributions received or earmarked for social, charitable or community purposes are registered according to existing accounting standards.



EDUCATION



ACCESS TO JUSTICE



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