

Ethical guidelines

1. Our commitment towards society

Aldeamo is passionate about generating a positive impact with technology in Latin America. In 1994 we were one of the first web companies in the developing world. In 2004, we entered the mobile world when nobody believed that the mobile phone could be used for more than making calls. Today, we are convinced that everything points to a connected world through mobile devices, where we will be able to relate to others as if we were part of a village, to get closer and make life easier. Thanks to technology, we are living the resurgence of the village. An evolved village. A mobile village. That is why Aldeamo is born (Aldea is Village in Spanish, and Mo comes from mobile). We facilitate people's lives by helping them use their mobile phones for much more than to make calls. We impact society not only with our services but also how we conduct business. The Aldeamo ethical guidelines are the foundation of the company's values and how we put those values into practice.

2. The Aldeamo ethical values

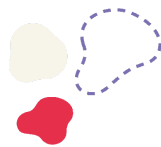
The Aldeamo ethical values reflect our commitment to society:

Integrity - All employees must follow the law, act with integrity and honesty in all matters, and be accountable for their actions.

Conducting ethical business – Aldeamo expects all employees to make ethical business decisions at all times.

1. **Anti-corruption** – No employee should ever try to obtain, or attempt to obtain, a personal benefit or business advantage through improper or illegal means. Corruption may involve payments or the exchange of anything of value. Corrupt arrangements with customers, suppliers, government officials, or other third parties are strictly prohibited.
2. **Anti-bribery** - no employee should ever offer, directly or indirectly, any form of gift, entertainment or anything of value to any government official or his or her representatives in order to: a) obtain or retain business, b) Influence business decisions, or c) Secure an unfair advantage.
3. **Accuracy of business and financial records** – Employees must ensure the accuracy of all company business and financial records. These include financial accounts and other records such as time records, expense reports and submissions such as benefits claim forms and resumes.
4. **Avoiding conflicts of interest** - Employees should avoid a conflict, or an appearance of a conflict, between personal interests and the company's interests.
5. **Watch against money laundering** - Aldeamo complies with all laws that prohibit money laundering or financing for illegal purposes. "Money laundering," is the process by which persons or groups try to conceal the proceeds of illegal activities





or try to make the sources of their illegal funds look legitimate. All employees have a responsibility to ensure they conduct business with reputable customers, for legitimate business purposes, with legitimate funds.

6. Confidential information – Aldeamo requires that employees protect the confidential information of the company and its business partners.

Respect and inclusion – Always act with respect for others and do all you can to create a work environment where all feel valued and respected for their contribution. Discrimination on the basis of race, gender, social status, sexual orientation, disability, religious or political affiliation, etc., will not be tolerated.

Harassment free environment – Aldeamo strives hard to provide a work environment that is free from harassment of any kind and/or any other offensive or disrespectful conduct. We define harassment as unwelcome verbal, visual, physical or other conduct of any kind that creates an intimidating, offensive or hostile work environment.

Health & safety – The health and safety of our employees are key concerns for Aldeamo and we strive to have an incident-free workplace. Aldeamo follows all safety rules and practices required by the law in the countries where we operate.

Substance abuse – Aldeamo has strict standards regarding substance abuse and weapons. Employees are not permitted to use or possess alcoholic beverages on company property, except where alcohol is specifically permitted at a company event. Employees are not allowed to use or possess illegal drugs or controlled substances at work or while engaged in any job-related activity.

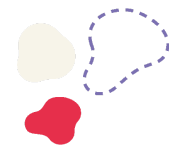
3. Ethical governance

Reporting - All employees have an obligation to uphold the ethical standards of Aldeamo. They must also report behavior inconsistent with the ethical values or that represents a clear violation. Doing so will allow Aldeamo an opportunity to deal with the issue, ideally before it becomes a violation of law or a risk to health, security or the company's reputation. Employees can report any concerns to management, the head of HR or the company's legal counsel.

Investigations – Aldeamo takes all reports of possible misconduct seriously. We will investigate reports confidentially, make a determination whether the ethical standards or the law has been violated, and take appropriate corrective action.

No retaliation – Aldeamo is committed to protecting the rights of those individuals who report issues in good faith. Reporting a concern honestly, cannot be the basis for any adverse employment action, including demotion, suspension, and loss of benefits, threats, harassment or discrimination.





If you want to have a conversation about these guidelines, or have noticed a breach from any Aldeamo representative, please do not hesitate to contact me.

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