



CORPORACION
AMERICA
AIRPORTS

Code of Conduct

APPROVED

REVIEWED

AUTHORIZED

Compliance

Legal
Audit Committee

Board of Directors

Change Records

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CONTENT

CHANGE RECORDS	1
LETTER FROM THE CEO	4
1. GOVERNANCE	5
2. SCOPE	6
3. PRINCIPLES OF THE CODE	7
3.1. Compliance with Laws	7
3.2. Work Environment.....	7
3.3. Health & Safety	8
3.4. Conflict of Interest	8
3.5. Gifts, Meals, Entertainment, Trips and Lodging	9
3.6. Compliance with Anti-Corruption Laws	11
3.7. Confidentiality and Secrecy	11
3.8. Insider Trading	13
3.9. Accounting Books and Records.....	13
3.10. Internal Controls	14
3.11. Assets and Resources.....	14
3.12. Social Networks.....	15
3.13. Intellectual property rights	16
3.14. Political Activity.....	16
4. RELATIONSHIP WITH STAKEHOLDERS.....	16
4.1. Community and Society	16

4.2. Environment.....	17
4.3. Government Agencies.....	17
4.4. Third Party with whom CAAP will enter into a Joint Venture or a M&A agreement.....	17
4.5. Business Partners.....	18
4.5.1 Clients	18
4.5.2 Suppliers, Service Providers and Tenants	18
4.6. Shareholders	18
4.7. Competition	19
4.8. Professional and Trade Associations and Unions	19
4.9. Media	19
5. INTEGRITY LINE	20
6. DISSEMINATION AND TRAINING.....	20
7. STATEMENT OF COMMITMENT	22

Letter from the CEO

This Code of Conduct is an important tool for achieving our goals and results. It aims to provide greater transparency, to satisfy legal and regulatory requirements, and to improve ethical standards. It also helps in the decision-making of our daily organizational challenges.

Operate with integrity and transparency allows us to continue doing business leading the private airport industry.

Management, acting on behalf of the Company, should act responsibly and with integrity.

It is the duty of everyone in the organization to ensure that the guidelines of this Code are followed in an effective manner, so that conduct of high professionalism and integrity is maintained, not only within the Company, but also in our relationships with clients, customers, tenants, suppliers, contractors, sub-contractors, agents, consultants, public authorities, the business community, regulatory agencies and society in general.

Our reputation is essential. It enhances our value as a company and customer loyalty, attracts high quality Colleagues and suppliers, and boosts creditor confidence.

This Code is subject to periodic reviews that help ensure a continuous process of updating content to address the evolving relationships of Corporación América Airports (“the Company”).

I expect you to comply with this Code and abide by its guidelines. You can address any questions regarding the interpretation of its provisions in an email to compliance-Integrity@caairports.com.



Martín Eurnekian

CEO

1. Governance

The Board of Directors and the Audit Committee of the Company will be the highest level decision-making body regarding the implementation of this Code of Conduct.

The Committee must take the necessary measures so that the parties reached by the policy, as appropriate to the circumstances and applicable, know, understand and apply the provisions of this Code.

Management, acting on behalf of the Company, must act responsibly and with integrity.

The Management and the Compliance Department shall implement the necessary rules and procedures to ensure compliance with this Code.

Likewise, the Management and the Compliance Department, in coordination with the Human Resources Department and other departments, as necessary, will adopt the necessary measures so that all members of the Board of Directors, members of committees, senior Management, employees, interns and trainees (hereinafter “the Colleagues”) are trained to comply with this Code.

The Compliance Department will resolve issues related to the interpretation of this document that cannot be satisfactorily resolved through the normal supervisory channels, being able to do so to have direct access to the Board of Directors and / or the Audit Committee.

2. Scope

This Code of Conduct applies to all subsidiaries and controlled affiliates of CAAP and to each of their respective board members, committee members, senior management, employees, interns and apprentices (hereinafter, “Colleagues”). It is also expected that all persons or entities who act as agents, partners, including business partners, representatives, intermediaries, consultants or who act on behalf of or provide services for CAAP (“Third Parties”) will comply with this Code of Conduct.

It is important that each of such persons is aware of the contents of this Code and complies with it both in their relations with the Company and when acting for it or on its behalf consistent with the following principles:

- (i) to respect the applicable laws and regulations in each jurisdiction where the Company is doing business or operates, as well as internal policies and procedures,
- (ii) to promote a healthy and respectful business climate and work environment favoring the professional and personal development of employees,
- (iii) to treat all employees equally and fairly, and shall not discriminate against them on the basis of race, color, religion, sexual discriminatory, abusive or any other unethical behavior.
- (iv) to prevent and to disclose any events or circumstances that could give rise to a conflict of interest (potential or actual) in connection with CAAP’s business, including, for example, any relationship between colleagues and Third Parties,
- (v) to prohibit providing anything of value, directly or indirectly, to officials of a foreign government or to foreign political candidates in order to obtain or to retain business, or induce the foreign official to perform or omit any act in violation of his public duty, influence the foreign official to affect or influence any government action, or obtain any other business advantage,
- (vi) to prohibit providing bribes to any private individuals, to protect the confidentiality of CAAP’s assets and information.

The Company intends to make this Code a standard of best practices for conducting business. It is not intended to be exhaustive and all the Colleagues and Business Partners must abide by the principles of this Code, all applicable laws and regulations, and proceed with common sense with respect to the Company’s operations.

The principles of this Code supersede any instructions given by a Colleague at any level of authority within the Company to his/her subordinates.

Violations of this Code may result in disciplinary sanctions, proportional to the seriousness of such violations and the laws in effect, including dismissal or the termination of the commercial

relationship, as appropriate, and/or legal action following any dismissal or termination of the commercial relationship.

3. Principles of the Code

3.1. Compliance with Laws

The Colleagues, the Business Partners, and any person related to the Company are responsible for understanding and complying with applicable laws and regulations where the Company conduct business, as well as the internal policies and procedures of the Company.

CAAP prefers to lose business than violate the law. Our integrity is more important than any transaction or deal.

3.2. Work Environment

The Company promotes the professional and personal development of its Colleagues, while providing equal opportunities to all of its Colleagues.

Likewise, the Company guarantees certain rules of coexistence that contain ethical and social aspects, and whose respect is essential to guarantee an adequate work environment.

In particular, this Code enshrines the right of all Colleagues to be treated with dignity and to be protected in their physical, mental and moral integrity. For this reason, the Company rejects all kinds of abuse, harassment, discrimination, and violence in the work environment between or towards its Colleagues, even when it comes from third parties outside the Company.

The zero-tolerance policy for conduct that threatens the dignity and integrity of the person or endangers the healthy work environment, extends - without limitation - to all forms of:

- harassment, including workplace harassment or mobbing¹, sexual, moral and psychological, or harassment for racial reasons,
- intimidation, offense, marginalization, discredit or any kind of improper behavior in the labor or professional scope.

The Company establishes the duty of each Colleague to report any behavior that threatens the integrity of the people and the healthy environment of the entire work group,

¹ **Mobbing or workplace harassment:** *it is defined as any form of moral or mental violence related to work, carried out by the superior or peers, against a Colleague and / or from a third party to the Company.*

guaranteeing the anonymity of the complainant (if he/she chooses this condition), the confidentiality of the information, and taking the necessary measures to avoid any retaliation, guarantees that are extended to any witness.

The Company will apply the protocol for the complaints investigation in order to make the decision that allows the adoption of corrective and disciplinary measures corresponding to those responsible, in accordance with the applicable legislation and regulations.

3.3. Health & Safety

The Company guarantees a work environment that protects the mental and physical health and safety in accordance with applicable laws and regulations.

The Company encourages each person to take care of their own safety and that of his/her colleagues, communicating any situation that he/she perceives as unsafe or as a risk to his/her health.

It is forbidden to go to work while under the influence of alcohol or drugs since such conduct could put their own and other individuals safety at risk. In the case of medications that may reduce the level of safety in the completion of a job, the individual should consult his/her doctor and not take risks.

3.4. Conflict of Interest

The Company is committed to preventing situations that constitute a potential or actual conflict of interest, in order to avoid any private interests of the Colleagues from interfering with the interests of the Company.

Colleagues are prohibited from realizing personal benefits from the information they have access to by reason of their position. In addition, no Colleague shall use his/her position to request or give personal favors.

A conflict of interest arises when a Colleague gives precedence to or may give precedence to their personal interests or a third party's interests to those of the Company and when such interests interfere or may interfere with their business decisions, actions or criteria. A conflict of interest can be:

- **Actual:** the Colleague is in a situation where he/she can benefit and / or benefit a family member, relative and / or close friend, giving precedence to their interests (and / or the interests of the family member, relative and / or close friend) to those of the Company.

- **Potential:** a situation where there is no actual conflict of interest, but it may be reasonably expected that a conflict may arise in the future.

During working hours, a Colleague must devote 100% of his/her time to the activities inherent to his/her position.

The Company allows professional relationships with close ties, but, to avoid conflicts of interest, familiar, - and/or non- company business relationships (according to the respective Policy) must be avoided in situations in which a relationship of subordination exists, or in which one of the Colleagues holds a position that allows the contracting, evaluation, promotion or dismissal of the other. The same rule applies in cases where there is confirmation, control or continuity of a process that creates a risk of fraud (such as placement of purchase orders, confirmation of services rendered and making payments), even if they are from different departments or no relationship of subordination exists.

Colleagues who individually participate or have family members who participate in any organization doing business or that wishes to do business with the Company, must avoid participating in decisions of contracting, evaluation/control or service confirmation.

In compliance with the Conflict of Interest Prevention Policy, each situation that has the potential of creating a conflict of interest must be informed through the form established in such policy, to their immediate supervisor for its analysis and management, who will assess whether an actual or potential conflict of interest exists according to the guidelines of the specific policy.

3.5. Gifts, Meals, Entertainment, Trips and Lodging

No Colleague should offer, promise, give, request, agree, receive or accept (“offer, deliver or receive”) invitations, gifts, meals, entertainment, trips/travelling expenses or lodging, donations, contributions or other types of hospitality or courtesies (generically “Items of Value”) whose purpose could be reasonably interpreted as obtaining an “improper benefit” or causing an “improper influence” on the conduct of any third party who receive those Elements of Value (“improper influence”).

Any Item of value referred above cannot have the purpose of bribery, attempt to exert “Improper Influence” or change a decision in the best interest of the Company or personal benefit.

CAAP has zero tolerance for all forms of bribery and corruption.

Accordingly, such gifts, meals, entertainment or lodging must be “given or received” only under some special circumstances accordingly, in the ordinary course of business, ethically justified and never be in cash or cash equivalents.

If the aggregate estimated value exceeds the limit established in the Gifts, Entertainment and Donations Policy, it must be rejected and reported to your immediate manager, who will report the matter to the Compliance Department.

Invitations “offered or received” to participate in business events such as, conferences, conventions, commercial presentations or technical courses, which may imply the payment for stays and/or tickets by a third person, raffles or gifts, must be authorized by the corresponding level of supervision, with the title of manager (or higher level of authority) and the Compliance Department, based on a duly provided justification from the person requesting the authorization.

Anti-Bribery & Corruption Risk Policy (ABC Policy) and Gifts, Entertainment and Donations Policy must be followed.

3.5.1. Government Officials

Gifts, meals and entertainment must not be given, directly or indirectly, to government officials (as defined in the ABC Policy), their immediate family members and known close associates, or to any other person with whom CAAP conducts or may conduct business to improperly influence or reward an act or decision or as an actual or intended quid pro quo for any benefit to CAAP.

In addition, the legal prohibitions in force in each jurisdiction regarding Gift and Hospitality rules to government officials must be considered and followed.

Gifts, hospitality and entertainment promised, offered, agreed or provided on behalf of CAAP to a Government Official or to anyone else with whom CAAP carries on or might carry on business must be:

- a. Reasonable and customary – not lavish, extravagant or too frequent;
- b. Proportionate to an underlying business purpose related to the promotion, demonstration or explanation of CAAP’s products and services;
- c. Compliant with local law;
- d. Transparently documented – there can be no effort made to conceal the expense either by CAAP or the recipient and the expense must be recorded in the specified account designated for the payment of such expenses; and
- e. compliance with the pre-clearance requirements and monetary limits set forth below.

Additional guidance about extensions of gifts, meals and entertainment can be found in the Gifts, Entertainment and Donations Policy.

3.6. Compliance with Anti-Corruption Laws

The U.S. Foreign Corrupt Practices Act (the “FCPA”) prohibits giving anything of value, directly or indirectly, to officials of a foreign government or to foreign political candidates in order to obtain or to retain business, induce the foreign official to perform or omit any act in violation of his public duty, influence the foreign official to affect or influence any government action, or obtain any other business advantage. The Company is also subject to various other applicable anti-corruption laws (together with the FCPA, the “Anti-Corruption Laws”), which prohibits bribes to any individuals, not just government officials, and includes an offense for receiving bribes in addition to giving bribes.

Colleagues are strictly prohibited from offering, promising, paying or authorizing the payment, directly or indirectly, to a government official or other person to influence or reward any act of such person, or otherwise making any payments or providing anything of value in violation of the Anti-Corruption Laws. State and local governments, as well as foreign governments, may have additional rules regarding such payments. Directors, officers and employees shall comply with the Anti-Corruption Laws and all other applicable anti-bribery, anti-kickback, and anti-corruption laws, rules, and regulations.

No matter how common the practice, or how small and seemingly inconsequential the size of the payment, CAAP prefers to lose business than violate the law. Our integrity is more important than any one transaction or deal.

The Company’s policies and procedures regarding compliance with Anti-Corruption Laws are memorialized in the Company’s (the “Antibribery and AntiCorruption Policy”). Colleagues have a continuing and independent obligation to ensure compliance with Anti-Corruption Laws and the Anti-Corruption Policy.

3.7. Confidentiality and Secrecy

The protection of the Company's information is essential for the integrity of the Company and the performance of the operations that require the collection of such data.

Colleagues, Business Partners, and other third parties under certain business circumstances (as described in 4.4), undertake to keep strictly secret the information of the Company and to make a responsible, ethical and lawful use of the information related to the Company.

Such persons shall use the information that is owned or in possession of the Company solely for the purposes for which it was provided and shall not transfer them to other people, not even for conservation.

3.7.1 Confidential Information definition

For all purposes herein, the term “Confidential Information” shall include, without limitation and regardless of the format in which it may be found: any information in possession or owned by the Company, trade secrets, information referring to the commercial business, operations and financial condition, including the financial statements, operating history, financial projections, marketing plans, contracts, commercial know-how, analysis, compilations, designs and development information, drawings, plans, studies, databases, personal data, and any other information or document created by employees, legal advisors, accountants, suppliers and service providers or other Company’s representatives or third parties. The Company may consider as confidential any other information that is not included in this definition, which will be duly communicated and categorized within the Company as such nature or defined by applicable law.

All the Information received by the Colleague, Business Partner, or any other Third Party when applicable shall be kept confidential and shall not be disclosed to third parties, except with the prior express written consent of the Company or when required by law, by a court order or is publicly known information.

The obligation of confidentiality of the Colleagues, Business Partner or also third parties when applicable, shall survive the termination of the labour or contractual relationship that allowed access to such data.

To ensure such confidentiality and prevent potential harm, we encourage Colleagues and Business Partners to be careful when commenting on sensitive matters inside and outside the Company, including lectures, seminars, and other public events; or handling such confidential documents, not mentioning the Company’s projects and internal affairs in open, public environments and keeping documents with sensitive information and confidential documents, work papers or files and complying with the safekeeping of documents for the period determined by law.

It is forbidden to make copies (including taking pictures of Colleagues, work facilities, computer screens, reports, or any other information), for personal use, of documents that may contain confidential information of the Company, including information on customers, suppliers or any subject that relates to the activities carried out. In addition, it is forbidden to remove equipment or documents from the workplace without prior relevant authorization.

Confidentiality obligations survive even after the termination of employment and in accordance with the applicable laws in effect.

In electronic transactions, a Colleague password is equivalent to his/her signature. Therefore, a password should be kept secure and private only accessible to its owner and disclosure to third parties is not permitted.

3.8. Insider Trading

According to the Insider Trading Prevention Policy in place, insider trading and insider tipping are strictly forbidden.

No Colleague or Business Partner may, directly or indirectly, purchase, sell or otherwise trade in securities of the Company or any company that trades with the Company while in possession of material, non-public information.

In addition, Colleagues and Business Partners may not divulge, directly or indirectly, to third parties any material, non-public information accessed by them in the performance of their tasks for the Company, and concerning the Company or any other publicly traded company.

Beyond disciplinary action or the termination of the commercial relationship, as appropriate, and within the applicable legal framework, a violation of this policy may lead to further legal actions against the Colleague or Business Partner involved.

Colleagues and Business Partners investing in stocks must understand the regulations restricting their capacity to trade securities and/or to provide sensitive information to third parties.

For additional information, please refer to the Insider Trading Prevention Policy.

3.9. Accounting Books and Records

All internal control procedures established by the Company must be followed in order to ensure the accurate accounting of transactions and their appropriate disclosure.

According to FCPA regulation, the accounting provisions require making and keeping accurate books and records and to devise and maintain an adequate system of internal accounting controls. The accounting provisions also prohibit individuals and businesses from knowingly falsifying books and records or knowingly circumventing or failing to implement a system of internal controls.

When preparing financial information, the Company's departments responsible for each activity must certify that they have complied with the controls established by the Company and that the information provided was prepared in conformity with generally accepted accounting principles, is true and accurate, and a document preservation system is established according the requirements set forth in the applicable law.

Misrepresentation, concealment, falsification, circumvention, and other deliberate actions resulting in inaccurate financial books and records are unlawful and will not be tolerated.

3.10. Internal Controls

Controls aim to protect corporate assets, efficiently manage operations, provide accurate and complete accounting information and prevent illegal conduct.

The policy of the Company is to disseminate, at every level of its organization, a culture characterized by an awareness of the existence of controls and a control-oriented mindset.

The Management is the principal responsible for building an efficient internal control system, but Colleagues at all levels of the organization are responsible for adherence to established controls and for identifying and addressing any perceived weaknesses or failures in the proper functioning of internal controls.

The system of internal accounting controls should be sufficient to provide reasonable assurances that:

- (i) transactions are executed in accordance with management's general or specific authorization;
- (ii) transactions are recorded as necessary to permit preparation of financial statements in conformity with generally accepted accounting principles or any other criteria applicable to such statements and to maintain accountability for its assets;
- (iii) access to its assets is permitted only in accordance with management's general or specific authorization; and
- (iv) the recorded accountability of its assets is compared with existing assets at reasonable intervals and appropriate action is taken with respect to any differences.

3.11. Assets and Resources

Colleagues must use Company's assets and resources only for purposes authorized by the Company.

They must care for and use them responsibly and respectfully, whether they are financial resources, electronic devices, furniture, installations, vehicles, uniforms, machines, tools, systems, ideas, trademarks, or of records or information, and all of which should be treated and used exclusively for the benefit of the Company.

All equipment, programs, software and systems used must be previously approved by the Information Technology Department ("IT") and changing the configuration of the Company's computer or notebooks, downloading web programs, and/or installing and using unapproved software is not permitted, without the authorization and supervision of IT.

The internal mail service (mail, e-mail, etc.) of the Company and the sending of electronic files to third parties must only serve the business purpose of the Company and be in accordance with the instructions of IT.

Electronic devices of the Company cannot be used to knowingly send or receive offensive jokes, inappropriate e-mails or pornography. In addition, offensive actions or communications to Colleagues, Business Partners and/or third parties using the Company's media, or on behalf of the Company, will not be allowed.

The use of private / personal emails (such as Hotmail, Yahoo, Gmail accounts, etc.) of Colleagues for work purposes, including the transmission of Company information through such means, is discouraged.

In order to verify if the provisions of this Code are being complied with, the Company reserves the right to access, record or monitor any of its electronic means of communication.

The adherence of this Code by the Colleagues might be considered informed consent according to the applicable Data Privacy regulations.

3.12. Social Networks

Upon entering into an employment or commercial relationship with the Company, a Colleague or Business Partner establishes a relationship between the content that he/she publishes and the image of the Company. Therefore, the Colleague or Business Partner's participation in social networks and websites cannot jeopardize the principles that the Company promotes. Posting on social media photos or videos with inappropriate content, exposing the Company, clients and other Colleagues or Business Partners is prohibited. We suggest that Colleagues or Business Partners, upon publishing their relationship with the Company in their profiles, avoid taking sides on issues that may pose a risk to the Company's reputation.

It is forbidden to share confidential information or comment on the Company's affairs on public or private networks, as well as creating groups/pages on social media or websites bearing the Company's name and/or logo.

The dissemination of the Company's information on social media is the exclusive responsibility of the Institutional Affairs Department 2 and the Investor Relations Department, or others expressly approved under the procedures of these departments.

² Or equivalent.

3.13. Intellectual property rights

Proprietary rights over any knowledge developed in the workplace environment or by virtue of a business relationship belong to the Company, which reserves its right to exploit such knowledge in the manner and at the time it considers most suitable, in accordance with applicable laws.

The ownership of intellectual property includes, but is not limited to, plans, systems, procedures, methodologies, courses, reports, forecasts, drawings or any other activity performed in or contracted by the Company.

3.14. Political Activity

The Company respects the rights of its Colleagues to participate in the politics, but prohibits participation on behalf of the Company in political activities, within the Company settings or outside of them.

Colleagues will be able to participate in all activities and political parties of their respective country, but they cannot do so within work hours or use the resources of the Company (such as telephones, e-mails, prints and other forms of communication) for the dissemination of political propaganda, and such propaganda within the workplace is prohibited.

Any contributions by the Colleagues of the Company, as well as activities rendered by them, must be understood exclusively as personal and voluntary.

Political opinions must not be used to evaluate the individual's performance at work neither influence the development of his/her career.

Political contributions - made as a direct payment or as support costs to a candidate (such as a fundraising event) - are a high-risk activity from an FCPA point of view, as the perception that often contributions are made with some expectation of obtain a commercial privilege. Such political contribution are forbidden.

4. Relationship with Stakeholders

4.1. Community and Society

The Company seeks to align its business strategy with a commitment to contribute to the economic and social development of the communities in which it operates, to promote local development in a sustainable and efficient manner and to respect values for a clean, healthy, and safe working environment.

On a larger scale, the Company's responsibility to society is to build lasting relationships based on trust, integrity and respect, generating values that are in tune with the legitimate interests of society and which result in positively impacting, not only society, but also the Company and other stakeholders.

4.2. Environment

The Company promotes sustainable development standards, including protecting the environment and the rights of future generations. This, by adopting the best economically viable practices to reduce the generation of waste and the consumption of natural resources and greenhouse gases emissions, and complying with the environmental legislation and regulatory obligations.

4.3. Government Agencies

The Company fully cooperates with regulatory and governmental agencies and fully complies with the legislation and rules applicable to its relations.

Any official documents sent by public authorities must be immediately forwarded to the Legal Department (or Area defined for such purpose), who will assess and authorize the proposed answers before they are made available.

No Colleague or Business Partner, unless duly authorized by proxy, may speak on behalf of the Company with public authorities. In such a case, they should respectfully refrain from providing an answer, and instead refer such query to the competent department within the Company.

The Company vehemently rejects any form of corruption, favoritism and extortion at all levels. The offer of payment in cash or any other personal benefit to a public official, directly or indirectly, is strictly prohibited. When interacting with government officials, Colleagues and Business Partners must comply with the ABC Compliance Policy.

4.4. Third Party with whom CAAP will enter into a Joint Venture or a M&A agreement.

We recognize that our Business Partners play an important role in our overall success. Accordingly, the Company strives to conduct business with individuals and organizations that share our commitment to upholding high ethical standards and who operate in a socially and environmentally responsible manner.

Joint Ventures, Mergers and Acquisition activities are undertaken only after approval of CAAP's Board of Directors. None of these activities may be undertaken without appropriate due diligence in accordance with the rules defined for such purpose by the Compliance Department.

4.5. Business Partners

4.5.1 Clients

The Company is committed to the satisfaction of clients, meaning a respect for their rights and the search for solutions meeting their objectives. Therefore, Colleagues and Business Partners must act with courtesy, efficiency and effectiveness, offering appropriate solutions within the expected timeframes, seeking to achieve excellence in service. Likewise, Colleagues and Business Partners must act in an integral manner with the Company's clients, aiming at the highest levels of quality and the long-term development of relationships based on trust and mutual respect.

4.5.2 Suppliers, Service Providers and Tenants

The Company's suppliers, service providers and tenants are considered key to improving the Company's competitive position and ensuring a constant level of customer satisfaction. Therefore, they must be evaluated by technical and commercial criteria and without discrimination. In particular, their hiring will entail the corresponding due diligence process in accordance with the standards defined for this purpose by the Compliance Department.

The relationship must be guided by professionalism, transparency and respect.

The Company may terminate a business relationship at any time if it damages or disregards legal, tax, labor, quality, service, environmental, health, and safety standards in coneciton with the Company's business and operations.

Suppliers, service providers and tenants dealing with government officials on behalf of the Company, must comply with the rules defined for such purpose by the Compliance Department.

4.6. Shareholders

The purpose of the Company is the continuous creation of value for its shareholders, based on truthful, objective, transparent, adequate and timely communication of information under conditions of equality for all its shareholders, without privileges of access to information of any kind. Information not yet publicly disclosed, which may affect investment decisions, must not be disclosed.

The Company is committed to implementing effective disclosure controls and procedures.

4.7. Competition

The Company acts in its own interest in all business situations and avoids practices that restrict or affect competitive conditions of trade, directing its Colleagues to reject all actions that may be interpreted as anticompetitive, monopolistic, or contrary to current legislation.

The Company observes and respects competition and antitrust laws and does not allow any information on the market or on its competitors to be obtained through questionable or illegal procedures. Nor does it knowingly violate the intellectual property rights of others.

No Colleague or Business Partner is authorized to make comments or disseminate rumors that could affect the image or reputation of competitors.

4.8. Professional and Trade Associations and Unions

The Company seeks to promote the debate of issues that could have a possible impact on the interests of the Company, maintaining an environment of open dialogue with professional and trade associations and labor unions.

The Company's Colleagues are free to associate and participate in such associations and unions. However, when it Colleagues are representing the Company in any professional or trade association, they must obtain prior authorization from management.

4.9. Media

Contact with the media plays an important role in developing the Company's image. Inappropriate communications may result in serious damage to the Company's image, and therefore, all the information related to the Company must be transmitted in a true and consistent manner.

No person whether a member of the company or a third party, is authorized to talk to the press without the express authorization of the Press Department and the Investor Relations Department, or others expressly authorized under the procedures of these departments and briefed accordingly.

Other Colleagues or Business Partners are not allowed to provide information or news about the Company to representatives of the press.

5. Integrity Line

The Company is committed to achieving the highest standards of best practices, in promulgating and implementing this Code. In this sense, it counts on the Colleagues to comply with this Code and to urge others to comply with it.

Any Colleague or Business Partner who knowingly violates this Code or who authorizes, asks or permits a violation by a subordinate is subject to disciplinary action, including dismissal or termination of the commercial relationship, as appropriate.

Individuals with knowledge of facts or data that are inconsistent with this Code must report that situation using the Integrity Line held by the Company for such purpose.

The Integrity Line is an exclusive reporting mechanism of the Company to receive complaints, in a safe and, if requested, anonymous manner, about behaviors or conducts considered contrary to the provisions of this Code, or that violate current legislation.

The Company does not tolerate retaliation against those who report possible violations of this Code in good faith. Any retaliation must immediately be reported to allow the Company to investigate and take the appropriate measures.

The information recorded in the Integrity Line will be received by an independent and specialized company, ensuring confidentiality and appropriate treatment for each matter.

Investigations will be conducted according to the respective policy.

You can report your complaint through the following channels of communication:

- Web form: <http://www.resguarda.com/INTEGRITYLINE/en.html>
- e-mail: integrityline@resguarda.com
- telephone line (detail available in web form)
- Or contacting any member of the Compliance Department (or Internal Audit Department or Legal Department)

6. Dissemination and Training

The Company trains its Colleagues on its ethical values to promote knowledge of this Code and its related policies as a way to help guide the conduct of Colleagues and Business Partners. The Company may determine it is necessary to train certain Third Parties, according to the risk posed, on the Company's policies, procedures, and conduct expectations.

Likewise, the Management and the Compliance Department, in coordination with Human Resources, will guarantee compliance with a Training Program in Ethics and Integrity on a mandatory and periodic basis. There will be a record of attendance or digital certification according to the corresponding modality. In particular, all the Company's Colleagues must send the Human Resources Department the Statement of Commitment stated in point 7 duly complete.

The Human Resources Department is responsible for ensuring that Colleagues are duly informed about the policies at the time they are hired.

This obligation includes all current Colleagues and those that may enter the Company in the future.

7. Statement of Commitment

I declare that I have read and understand the Code of Conduct of the Company. I agree to fully comply with it and with the related policies in all of my activities related to the Company and its business and operations and/or when I am representing the Company. I understand that it is my responsibility to respect the policies, practices and standards established and cited in this Code and I agree that this Statement of Commitment is an expression of my free consent to comply with this Code of Conduct.

Full name:

Registration number:

Department:

Place / Date:

Signature:
