



## G TOWERS GROUP

### ETHICS CODE OF G TOWERS GROUP

This anti-bribery code of ethics implemented by **G TOWERS GROUP** aims to combat bribery.

The scope of application covers all managers and collaborators, regardless of their contractual status or nationality. It also extends to suppliers, consortia, contractors and third parties who may represent us or act on our behalf.

The Compliance Officer is responsible for enforcing this document, reporting directly to Senior Management.

#### Guidelines:

1. Do not incur in any form of bribery, through direct or indirect actions through third parties.
2. Do not offer or make improper payments, or authorize improper payments (cash or otherwise) to any individual, including public or private officials.
3. Do not induce individuals, officials or public or private servants to act illegally or improperly.
4. Do not make false or misleading entries in the company's books or financial records.
5. Do not offer or accept money or any valuables, such as gifts, trips, loans, favors, commissions, invitations, or special treatment in connection with obtaining business or the benefits of a contract.
6. Do not offer or accept any gift or show of hospitality to any public or private official or servant if there is an expectation or implication of returning a favor.
7. Lunches and other services to public or private officials are permitted as long as they are due to a legitimate action of the business and cannot be interpreted as a form of undue influence.

1. In the event that any gift, gift or similar benefit arrives at the headquarters of the company or the services that are being developed, personnel will proceed as established in the procedure of Gifts, hospitality, donations and similar.
2. Inform and not hide relationships or situations in which personal, work, economic or financial interests could be in conflict with the fulfillment of the duties and functions in their charge.
3. Do not deal directly with business partners who may also be customers, suppliers or third parties, with whom the employee or their family members have interests.
4. Do not carry out political proselytizing activities through the use of infrastructure, goods or resources of the company, either for or against political parties or organizations or candidates.
5. Do not agree on prices or other conditions with competitors or other stakeholders, either directly or indirectly.
6. **G TOWERS GROUP employees** will not disclose any data or information that is used in the development of their activities.
7. Collaborators will not use privileged information for their own benefit or that of third parties, using it only for the purpose for which it was obtained. In addition, they must not make fraudulent use of such information.
8. Cooperate fully in the development of any investigation initiated by **G TOWERS GROUP** in the face of the alleged commission of any infringement of the Anti-Bribery Management System. The Ethics Line ([ethics@gtowersgroup.com](mailto:ethics@gtowersgroup.com)) is available to all our collaborators, customers, suppliers or third parties with whom we interact, for any complaint, which will be treated confidentially.

Approved March 15, 2022