



COMPLIANCE

INDEX

Mission, vision and values

1) INTRODUCTION

- a) Scope of application**
- b) Personal responsibility**
- c) Responsibility of the bosses**
- d) Sanctions**

2) SAFETY AND OCCUPATIONAL HEALTH

3) RELATIONSHIP WITH THE COMMUNITIES AND THE ENVIRONMENT AMBIENT

4) RESPECT FOR PEOPLE

5) INTEGRITY AND RESPONSIBILITY FOR THE REPUTATION

6) LOYAL COMPETITION

7) ANTI-CORRUPTION

- a) Offer and Grant Advantages**
- b) Demand and Accept Advantages**
- c) Public Contracting**
- d) Prevention of Money Laundering**
- e) Political Contributions**
- f) Charitable Donations and Sponsorships**
- g) Relations with Third Parties**
- h) Conflicts of Interest**

8) USE OF COMPANY PROPERTY

9) RECORDS AND FINANCIAL INTEGRITY

10) CONFIDENTIALITY

11) DATA PROTECTION AND SECURITY

12) ADVICE, GUIDANCE AND COMPLAINTS

13) COMPLAINTS

14) PROTECTION OF THE COMPLAINANT

MISSION

Contribute to the well-being and evolution of society through the construction of works and services, executing them with quality, in an environment of safety and respect for the environment, while generating in the company, an environment conducive to professional development and staff of its members.

VIEW

To be a leading construction company in the national market, recognized for its compliance, quality, innovation, technical capacity and respect for the environment, which exceeds its standards day by day, achieving the maximum satisfaction of our clients and of all the people we work with. in this.

VALUES

- Respect
- Integrity
- Quality and Commitment
- Teamwork
- Continuous learning

1) INTRODUCTION

Our code of conduct contains the principles under which our company conducts its business.

It is the fundamental pillar of our internal behavior among which we are part of the work team and in turn, in our external behavior towards our clients, suppliers and the community in general.

Our code offers guidance and examples to help you when you face challenging situations in your daily work. It also contains reference to current legislation and internal policies of our company.

a) Scope of application

This code of conduct is applicable to all of us who are part of Mapal, meaning that shareholders, directors, employees, interns (hereinafter collaborators), suppliers and third parties must know it, understand it and give strict compliance.

b) Personal responsibility

The Code, by nature, cannot describe all the possible situations that may arise in our daily work, so if you cannot find the answer in the Code, or if you have doubts about how to interpret it, ask for help consulting with your superior or the Responsible for Integrity.

It is your responsibility to seek collaboration.

c) Responsibility of the bosses

Although all collaborators have the responsibility to act in an integral way, each leader has the responsibility to lead by example.

We hope that our leaders will commit themselves and act as an example and role model:

- Inspiring others to adopt our Code.
- Making it your own, spreading it and promoting decision-making in an ethical and honest way.
- Creating an open and respectful work environment in which team members feel comfortable sharing their concerns and making inquiries.
- Seeking to solve the problems and report them to their superiors as they appear, being able to report the facts that they consider corresponding without fear of retaliation.

d) Sanctions

Violations of this Code of Conduct, policies or legislation, can have serious consequences, including disciplinary actions that could lead to the termination of the employment relationship, as well as possible civil or criminal penalties for both the Company and individuals.

2) SAFETY AND OCCUPATIONAL HEALTH

Provide A safe and healthy workplace for all employees is a priority for Mapal, our main objective is that we all arrive healthy and safe in our homes, no one should suffer an injury while working with or for us.

To do this, we promote a culture that fosters personal responsibility for each of our own collaborators and our suppliers, with the commitment of all.

We integrate occupational safety and health in all business processes and promote a culture where we have the guidance and support of specialists in the field.

It is strictly prohibited to work under the influence of illegal drugs, prescription drugs, even if used incorrectly, alcohol or any other substance that alters our ability to work safely.

3) RELATIONSHIP WITH COMMUNITIES AND THE ENVIRONMENT

Mapal promotes its integration with the communities, with dedication and a spirit of service, acting with commitment and responsibility.

It is committed to protecting the environment, the health and safety of employees, customers, contractors, and the general public. As part of this commitment, environmental, health and safety laws and requirements must be followed in all the places where it operates.

Failure to comply with these laws, regulations and policies can have a negative impact on communities and the environment, in addition to having serious legal consequences.

All collaborators must contribute to these objectives with conscience, generating exemplary individual and collective behaviors of respect.

4) RESPECT FOR PEOPLE

We respect the dignity, privacy and personal rights of each individual. We work with people of different backgrounds, cultures, religions, ages, political leanings, disabilities, races, sexual identity, views and gender.

In keeping with our values and labor laws, we do not tolerate discrimination against anyone based on any of these characteristics, nor harassment or offensive behavior, both sexual and otherwise.

These principles apply both to work within our company and to conduct also with our business partners, suppliers, subcontractors and any other third parties with whom we interact.

We make decisions in relation to those we work with - including employees, suppliers, customers and business partners - based solely on objective criteria and never on the basis of discriminatory or coercive considerations.

5) INTEGRITY AND RESPONSIBILITY FOR THE REPUTATION

Mapal's reputation is determined by our actions and by the way in which each and every one of us acts and behaves, which is why we must act with integrity, doing the right thing ALWAYS.

Illegal or inappropriate behavior by only one of our collaborators can cause irreparable harm to the company, which is why each collaborator must be aware of maintaining, promoting and preserving the good reputation of our company.

ALL employees must understand the requirements of our Code of Conduct, as non-compliance will entail disciplinary sanctions.

6) LOYAL COMPETITION

In order for markets to develop freely, fair competition is required between the companies in the industry, which is why each company must act freely and independently of its competitors.

At Mapal we act with integrity and independence, seeking to be chosen by our clients based on our quality, commitment, innovation, qualified team and in constant development and professionalization.

All collaborators are obliged to respect the rules of defense of competition, that is, they will not be able to:

- Talk to competitors about prices, production, capacities, sales, offers, benefits, profit margins, costs, internal methods or any other parameter that determines or influences the Company's competitive behavior, except in the case of joint works studies. .
- Reach agreements with the competition not to compete, to restrict agreements with suppliers, to present false offers or to distribute works, clients, markets, territories or production programs.
- Have influence on the prices of tenders, sales, etc.

Additionally, collaborators must not obtain information from the competition through meetings, bribery, theft, or eavesdropping, or intentionally communicate false information about competitors or their products and services.

7) ANTI-CORRUPTION:

a) Offer and Grant Advantages

We win our contracts and tenders honestly based on our quality, prices, commitment, innovation and services. Not through the promise, offer or delivery of improper benefits.

That is why no collaborator should, directly or indirectly, offer, promise, grant or authorize the delivery of money or anything of value to a government official, to influence any official activity or to obtain improper benefits. The same attitude of integrity must be observed in private business relationships.

Any offer, promise, grant or gift must comply with current legislation and with Mapal's internal policies. Avoiding exercising undue influence over a government official or counterpart in a business relationship.

The term government official is used generic form to include officials, officials and employees of the government or any public body, agency or legal entity, at any level, including officers or employees of publicly owned companies or international public organizations. It includes, also, candidates for political office, employees and political parties.

Employees are prohibited from indirectly delivering money or valuable things to consultants, agents, intermediaries, business partners or any other third party. If the circumstances indicate that they are, they can be assigned to government officials, to influence official decisions, to obtain or retain improper advantages.

Collaborators responsible for hiring consultants, suppliers, business partners or any other third party must take the necessary precautions to:

- Ensuring that all third parties understand, share and adhere to Mapal's anti-corruption policies.
- Assess the reputation of third parties.
- Include the necessary clauses in the agreements and contracts in order to protect Mapal's responsibility and reputation.

b) Demand and Accept Advantages

Employees cannot use their job to request, demand, accept, obtain or receive economic benefits of any nature.

c) Public Procurement.

Mapal is a construction company that tenders with the National, Provincial and Municipal State in a transparent and honest manner.

We strictly comply with the national and international laws in force in our country as well as the company's internal policies and procedures developed for this purpose.

d) Prevention of Money Laundering

Mapal's objective is to conduct business with clients, consultants, business partners and trusted third parties who are involved in legal business activities and whose funds come from legitimate sources. We do not facilitate or allow money laundering or any other illegal activity.

For this reason, the company's employees must be alert and report any suspicious behavior, and must also follow all applicable accounting, registration and financial reporting procedures regarding both cash and online payments for all transactions and contracts.

e) Political Contributions

Mapal is not politically oriented and does not make contributions to any political party or organization under current law.

f) Charitable Donations and Sponsorships

Due to the importance that Mapal gives and has always given to the social and humanitarian interest, it makes donations to social organizations that have adequate legal representation.

In the same sense Mapal carries out cultural and charitable sponsorships always in pursuit of the well-being and development of its city of origin and the communities where it operates.

All donations and sponsorships must be made in full accordance with the company's internal policies and procedures, and must be transparent in relation to the identity of the recipient and the effective use of the donation, the entire operation being duly justified and documented.

Donations or sponsorships, contributions to industry associations, or association dues in organizations that serve business interests.

g) Relations with Third Parties.

Mapal, as a company, expects its clients, business partners, suppliers and third parties in general with whom it works, to share Mapal's values and comply with all applicable laws.

Furthermore, Mapal expects its suppliers to take responsibility for acting on the following principles:

- Compliance with all laws applicable to the activities it carries out,
- Prohibition of acts of corruption,
- Respect for the basic human rights of its employees,
- Compliance with laws prohibiting the work of minors,
- Taking responsibility for the health and safety of your employees,
- Action in accordance with applicable international statutes and laws regarding the protection of the environment.

Mapal encourages all its customers, business partners, suppliers and third parties in general to adopt codes of conduct that uplift the values and commitment to the principles listed.

h) Conflicts of Interest

All of us who work at Mapal have the obligation to make the best decisions always taking care of the interests of the company and never based on our own interests, which is why in case of facing a conflict of interest we must declare it.

Mapal has an internal procedure that is available to everyone and guides us on how we must declare our conflict of interest in order to continue with our professional tasks in a safe and transparent manner.

No collaborator of Mapal may:

- Direct or collaborate in any company that competes with Mapal or engage in competitive activities.
- Carry out additional work tasks during Mapal working hours.
- Any other paid work without requesting prior consent from Mapal.

Teaching activities, author, lecturer are not considered additional activities. Previously granted permits can be revoked.

Collaborators who, directly or indirectly, hold or acquire a stake in a competing company, supplier or any other third party related to Mapal must communicate this fact in accordance with the company's internal procedure.

8) USE OF COMPANY PROPERTY

At Mapal's offices and other facilities we have assets such as vehicles, machinery, tools, devices and equipment, such as telephones, photocopiers, computers, software, Internet / Intranet, and other tools, including email addresses. These should be used only for the activity of the company and not for personal use.

In no case should the assets of the company be given a different use for which each collaborator has been given access.

Saving or sending information that is sexual, discriminatory or in any way incites violence or any other criminal act is totally prohibited.

9) RECORDS AND FINANCIAL INTEGRITY

Mapal has the obligation to maintain effective processes and controls so that transactions are executed in accordance with the authorization of the Company's Management and in accordance with current accounting laws, ensuring that the books and reports of the company are complete, accurate, and reflect honestly each transaction or expense as well as being carried out on time and in accordance with the applicable accounting principles and standards.

Said books and reports will include all the data, certifications and other documents provided for the internal financial report and for its publication or presentation to the competent authorities.

10) CONFIDENTIALITY

Strict confidentiality must be maintained regarding Mapal's internal information.

Non-public information regarding authorities, employees, suppliers, customers, collaborators, agents, consultants and other third parties must also be protected in accordance with legal and contractual requirements.

It is an obligation to maintain confidentiality continues even after the end of the corresponding employment or contractual relationship, since the publication of confidential information could harm Mapal's businesses, employees, suppliers or partners regardless of the time of its publication.

11) DATA PROTECTION AND SECURITY

Internet access, exchange and dialogue through social networks are essential for the effectiveness of the work of each of us and for the success of the business as a whole, but it also entails responsible use.

Mapal is very careful with personal data that will only be obtained, processed or used when necessary for certain, clear and legitimate purposes. Furthermore, personal data will be kept securely and appropriate precautions will be taken in its transmission.

12) ADVICE, GUIDANCE AND COMPLAINTS

Sooner or later, you may face a situation that represents an ethical dilemma while you are working at Mapal, if this happens, do not hesitate to comment, you can approach the referent in charge of Ethics and Integrity issues and consult about your responsibilities, and even share any concerns or report behaviors that constitute breaches of this code.

At Mapal we are convinced that compliance with our internal code, policies and procedures is essential to grow in a solid, sustained and sustainable manner, which is why we encourage all employees to comply with it and report all violations of it.

13) COMPLAINTS

All collaborators and third parties related to our company who are aware of any violation of this code should resort to:

- His direct superior.
- To the Head of Integrity or
- Use the anonymous reporting channel.

All complaints will be uploaded to our complaint reception and management system and will be managed in accordance with our internal investigation policy.

It will be a serious offense to receive a complaint and not load it in the corresponding system.

Access our reporting line through the link: [https // XXXXXXXX](https://XXXXXXXX) you can do it from our intranet and then delete your browsing history or you can also access the link from any device.

All documents, including physical copies, files and emails, cell phones, computers, etc., are the property of the company and may be periodically reviewed for compliance for purposes of investigation, audits or internal control activities.

14) PROTECTION OF THE COMPLAINANT

Mapal is committed to protecting the rights of people who report in good faith. Our company will not retaliate against people who, in good faith, report facts or concerns that constitute violations of our Code, our policies or the law.

Retaliation against an employee who reports a concern in good faith constitutes a serious breach of our Code. If you know of or suspect the existence, or are being the victim of retaliation, you should report it.

Failure to comply with the behaviors required by this code, directives, policies and procedures that are issued accordingly, is a serious matter that must be addressed by the board and may lead to disciplinary action, including the term of the contractual relationship.