CONEXIG ®

Consulting Experts International Group

CONEXIG CODE OF ETHICS AND BUSINESS CONDUCT

Last Update: Apr 4, 2025

Revision: 05

Approve by: Managing Partner

Language: English

CONEXIG ®
801 Travis Street, 2101, 77002,
#754, Houston, TX – USA [HQ]
T: +1 (888) 213-8012
M: +1 786 570 0186
www.conexig.com

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[EN] CODE OF ETHICS AND BUSINESS CONDUCT

Letter from the Founder and Managing Partner

Dear CONEXIGers, friends, and anyone who does business with us.

CONEXIG is a global, multidisciplinary consulting company that adds value to our clients proactively in a contemporary manner but also reactively, after issues have occurred, through our audit and investigation-based services.

Our commitment to our Clients and our People is to do everything we can to assure them a Smooth Journey.

As CONEXIGers we have to live ethically and following regulations, expectations of society, and good customs at all times. **The Code of Business Conduct and Ethics** is an important tool for achieving these goals. It incorporates principles, rules, and procedures that are to be practiced by all of our partners and leaders across the world.

Our Code is very simple and straightforward. It is structured with the following chapters:

- This Letter: The corporate commitment statement with the Code and its content;
- Corporate Values: A reminder of the principles and fundamentals that guide our collectiveness;
- Enforcement: The corporate commitment to enforcing the Code;
- Chapters: Detailed explanation of our Code.

Referring to our Code of Ethics for everyday behavior and decision-making process helps us building an understanding of our corporate principles and corporate culture. It also helps us applying these principles in our day-to-day relationships with our colleagues, clients, suppliers, and alliances. This helps us becoming better individuals and professionals every day.

We expect that all CONEXIG colleagues comply with this Code. Moreover, it also expected that others who work with us, on our behalf or not, such as contractors, advisors, and other suppliers, act in consistency with our Code. The understanding and practice of these guidelines will solidify the CONEXIG integrity and reputation worldwide, while taking into account aspects of culture, language, and needs of our global business.

We own compliance with this Code in the pursuit of a **Smooth Journey**.

FELIPE A. ISORÉ GUTIERREZ

FOUNDER AND MANAGING PARTNER

Corporate Values

Our Code of Business Conduct (or Code of Ethics) is founded on our core values. We live ethically and in compliance with regulations, society expectations and good morals always. We lead by example, with integrity and honesty. That's it!

ETHICS

We live ethically and in compliance with regulations, society expectations and good morals always. We lead by example, with integrity and honesty.

TRANSPARENCY

We are transparent in everything we do. From recruiting and performance 360° reviews to promising value add to clients or informing them about bad news. We communicate openly.

PEOPLE

We take care of our people, and they take care of our clients. At CONEXIG, the well-being of our people is our priority. We believe that by caring for and supporting our people, we have happy and motivated teams that provide exceptional service to our customers. Our employees are the foundation of our company, and we work hard to foster their holistic development, promote a workplace welcoming individuals from all backgrounds and ensure a healthy work-life balance.

INNOVATION

Driven by a commitment to excellence, we foster innovation in every business facet, from delivery to operations. As thought leaders, we create exceptional value, implementing pioneering initiatives for sustainable growth and competitive edge in our collaborations.

ESG DRIVEN

We give back to society, promoting equal opportunity, merit-based advancement, human rights and respect the environment in everything we do.

Enforcement

This Code is mandatory to partners, directors, officers, employees and anyone representing directly or indirectly the CONEXIG brand. Also, the consultants and all suppliers have to adhere to the applicable disposals.

Not every situation can be foreseen by this Code of Business Conduct, which means that if there are doubts and inquiries regarding specific situations, the supervisors, line managers, and local directors and partners are available to grant adequate support.

This includes situations when you have a suspicion that colleagues, clients, or parties associated with clients, or suppliers, subcontractors, or associated third parties are engaged — or maybe about to be engaged — in illegal or unethical activity. Moreover, in order to assure a smooth journey, CONEXIG provides an anonymous reporting channel to address such complex situations.

Everyone, regardless of the position, should raise the hand and speak up when the suspicious of misconduct is apparent. Such situation should be understood as a potential deviation from the behaviors described in this code.

The firm does not tolerate retaliation against an employee who, in good faith, raises a concern about any aspect of professional conduct or who fulfills their obligation to participate honestly in a firm or external investigation.

The failure to comply with the Code of Conduct and their Policies may result in disciplinary measures, including employment termination.

Chapters

Respect, and Meritocracy

We treat each other with respect and dignity. We are committed to providing a work environment free from harassment, including sexual harassment. We reject harassment and disturbance of others whether through the exchange of messages, personal conversations, or any other actions that fit and are capable of harassing co-workers.

The decisions of our people are based on meritocracy and Non-Discrimination, based on race, gender, age, disability. Meritocracy means that all employment **and advancement decisions** must be based **solely on merit, skills, and qualifications** as well as an individual's demonstrated contributions and capabilities in meeting CONEXIG's business needs. This applies to any decision about recruitment, hiring, compensation, promotions, performance and work assignments.

Meritocracy means that all employment and advancement decisions are based solely on merit, skills, and qualifications,

Equal Opportunity: Valuing and Respecting All

At CONEXIG, we are dedicated to fostering a workplace free from discrimination. We ensure that employment and advancement decisions are based solely on merit, skills, and performance.

Data Privacy

We process and protect personal data in compliance with data privacy laws. We comply with data privacy laws when collecting and processing personal data, including as it relates to our own people and our clients. Data privacy laws also give rights to individuals regarding their personal data.

We process personal data fairly and lawfully and provide access to personal data within our organization only on a need-to-know basis.

Anticorruption – Bribes - Gifts and Entertainment

We acknowledge that any gifts, entertainment, and hospitality accepted, offered, or granted with the purpose or intention to influence the decision-making process (improperly benefitting the firm or not), personal interests or a related third party's interest are prohibited.

We have zero tolerance for corruption in any form by any party (private and public officers).

We say NO when we know or should know about a wrong intention or an inappropriate offer referring to this context.

Retaliation is not tolerated

CONEXIG will not retaliate - and will not tolerate retaliation - against any individual who whistleblower in good faith or for participating in the investigation of any complaint.

Anti-Money Laundering

We apply the best efforts to know our counterparties according to a risk-based analysis. We treat the red flags and comply with the local regulations regarding reports to the authorities.

Accurate Reports

We prepare and provide accurate, timely, and complete financial and non-financial disclosures and reports.

Clients Relationships - Information - Assets

Our clients' relationships have a long-term vision based on independence, objectivity, high standards, and sustainable impact.

We must protect our clients' information from misuse, alteration, or similar misconduct.

We use the information only for the engaged business purpose, and we keep it confidential even from our colleagues if necessary.

When someone representing a client (e.g. attorney, owner, contractor, arbitrator, etc.) reaches out to you (by phone or any other communication mean) and say that they have something to say about any project you are not specifically responsible for, (i.e. you are not the Partner in Charge), you must refrain from listening and offer help by exclusively putting that person in touch with the Partner responsible for that job. Note that if the concern refers to an Ethics and/or Compliance related complain, then the Compliance channel continues available and that should be the correct channel for such complains (Assured Smooth Journey - CONEXIG[1]).

CONEXIG Information and Intellectual Property

CONEXIG respects and complies with Intellectual Property laws, repudiating any form of violation of industrial property, copyright, trade, and/or industrial secrets or improperly obtaining confidential information about products and services. We protect the firm's information and use the brands, logos, brochures, and similar only for the business context in a proper legal form.

Accordingly, CONEXIG employees, suppliers, or service providers may not reveal or encourage third parties to disclose or use classified, professional, and technical confidential information of CONEXIG or third parties.

The Intellectual Property of the projects and plans developed at CONEXIG is owned by CONEXIG, except if otherwise provided in specific contracts.

The use of classified information must be exclusively for professional purposes. It is prohibited to use it for its own benefit, the benefit of third parties, or for a purpose other than that for which the information was disclosed and received.

All employees, suppliers, and service providers with access to confidential information must sign the Confidentiality Agreement to preserve the strategic information of CONEXIG and/or its customers. This agreement guarantees the absolute confidentiality of the information obtained and generated in the performance of their activities.

[1] See attached image in Appendix 01

The confidentiality of information is required of all of us at CONEXIG during and after the contract term that establishes a link with CONEXIG.

Social Media

The participation in social media on behalf of CONEXIG may take place under express permission of CONEXIG and must contain constructive and well-founded references.

Corporate Citizenship

As CONEXIG members, we adopt corporate citizenship by respecting human rights and promoting environmental protection.

We focus our human rights efforts on areas most relevant to our business and operations, such as working practices, data privacy protection, and anti-corruption.

We incorporate leading environmental practices into our business strategy and operations, emphasizing:

- Running efficient operations
- Enabling client and supplier sustainability
- Engaging our people, leaders, business partners, and other stakeholders

We support our people in volunteering their time and skills to make a measurable difference for individuals, communities, and society through our Corporate Citizenship initiatives

Corporate use of digital communication systems

The exchange of messages, via e-mail, and access to the internet for personal matters is allowed, but they must not contradict internal rules and procedures and must not cause any prejudice to professional performance.

We do not allow access to pornographic and racist material stored on the network, distributed, edited, or recorded through the use of the network's computer resources.

Users are not allowed to change any settings defined by CONEXIG or disable security mechanisms. We make regularized software available to all users and prohibit any use of non-licensed software.

Work environment

Considering the safety of all, it is recommended to use the identification badge for circulation on

the company's premises. Service providers, visitors, and former employees will need authorization for entry and always with proper identification.

Compliance with our internal procedures and processes is also mandatory, all in line with the best corporate practices available on our network.

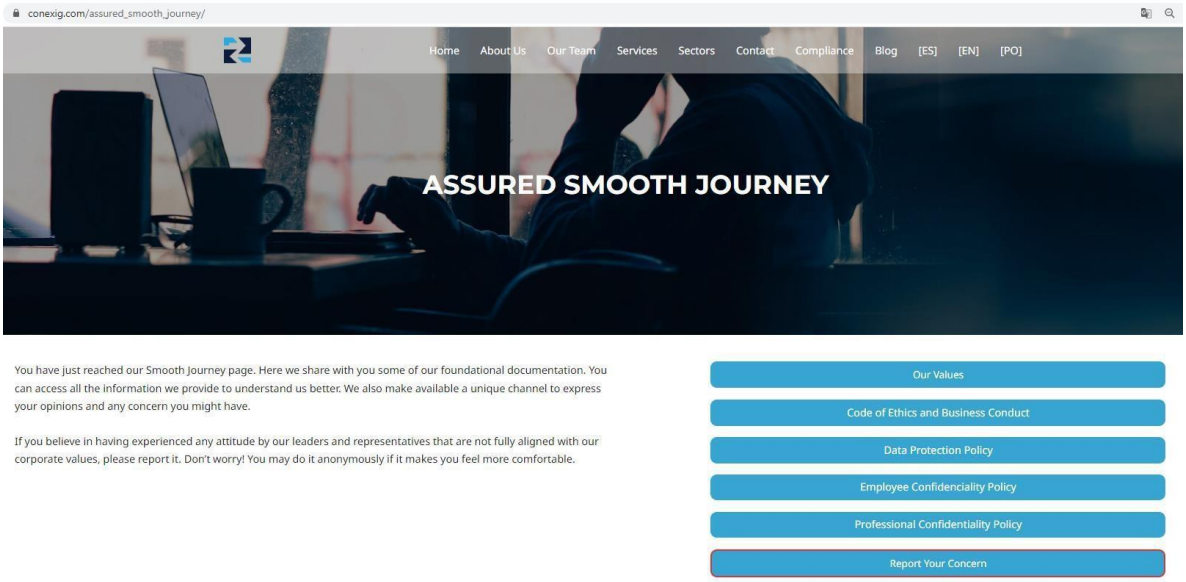
We expressly prohibit the consume of alcoholic beverages and drugs during working hours; Smoking inside closed company environments; Access the company's facilities under the influence of narcotics, legal or illegal substances; Bear arms, except employees or providers authorized to carry out the security and property surveillance service.

Validity

The Code of Conduct enters into force as of its disclosure, with no provision for termination.

There may be changes concerning its content at any time as needed. Systematic reviews are foreseen and will take place periodically.

APPENDIX 01



Version Control Approval			
Version	**Author**	**Date**	**Changes**
A	Felipe Gutierrez	Jan. 01, 2021	1st Version
B	Felipe Gutierrez	Nov 25, 2022	Document Header/Corporate Values
C	Felipe Gutierrez	Dec 22, 2023	Document Header/Corporate Values
D	Felipe Gutierrez	Feb 25, 2025	Adjustments to Executive Order 14173 in US Corporate Law
E	Felipe Gutierrez	Apr 4, 2025	Cover